Division of Land / Environmental Review

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DRAFT ENVIRONMENTAL IMPACT REPORT

VOLUME I

SHERMAN OAKS – STUDIO CITY – TOLUCA LAKE – CAHUENGA PASS COMMUNITY PLAN AREA

Buckley School Campus Enhancement Plan

ENV-2004-7171-EIR
State Clearinghouse No. 2005011055

Council District 5

THIS DOCUMENT COMPRISES THE FIRST PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE FINAL EIR, WHICH WILL ALSO CIRCULATE FOR PUBLIC REVIEW AND COMMENT, WILL COMPRISE THE SECOND AND FINAL PART.

Project Address: 3900 Stansbury Avenue, Sherman Oaks, CA 91423

Project Description: The Buckley School (the School), the project Applicant, proposes to enhance its existing campus facilities located at 3900 Stansbury Avenue in the Sherman Oaks Community of the City of Los Angeles. The improvements are proposed as part of the Campus Enhancement Plan, the intent of which is to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. Included within the Campus Enhancement Plan are vehicular circulation and queuing improvements, increased parking within a new enclosed parking facility, the demolition of six buildings, construction of five new/replacement buildings, a central plant, and addition to and/or renovation of several existing buildings. Upon completion, a net addition of approximately 69,500 square feet of building area would be provided, resulting in a total of 168,650 square feet of educational facilities within the project site. Project implementation would require various approvals, including but not limited to, Specific Plan Exceptions and Environmental Findings pursuant to the Mulholland Scenic Parkway Specific Plan, a new Conditional Use Permit that among other things would allow an increase in enrollment of up to 80 students for a maximum enrollment of 830 students, Modification of the height regulations, Site Plan Review findings, a Parcel Map to create two legal lots, and Design Review pursuant to the Mulholland Scenic Parkway Specific Plan.

APPLICANT:
The Buckley School

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

November 2006

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I. SUMMARY

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this Environmental Impact Report (EIR) contains a brief summary of the proposed actions and its consequences. More detailed information regarding the project and its potential environmental effects are provided in the following sections of this EIR.

A. PROPOSED PROJECT

The Buckley School, the Project Applicant, proposes to enhance its existing campus facilities, located at 3900 Stansbury Avenue in the Sherman Oaks Community of the City of Los Angeles. The Buckley School is an independent, co-educational school that currently enrolls approximately 750 students in kindergarten through grade twelve. The proposed Campus Enhancement Plan is intended to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. Included within the Campus Enhancement Plan are vehicular circulation and queuing improvements, increased parking within a new 240-space enclosed parking facility, the demolition of six buildings, construction of five new/replacement buildings, a central plant, and addition to and/or renovation of several existing buildings.[1] Upon completion, a net addition of approximately 69,500 square feet of building area would be provided, resulting in a total of 168,650 square feet of educational facilities within the project site.

B. OVERVIEW OF THE PLANNING CONTEXT

The City of Los Angeles is the Lead Agency for the proposed project, pursuant to the California Environmental Quality Act (CEQA). This EIR has been prepared at the direction and under the supervision of the City of Los Angeles Department of City Planning in accordance with CEQA and the Guidelines for California Environmental Quality Act (State CEQA

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[1] *Under the project, a total of 306 parking spaces would be provided on-site, including 66 surface parking spaces provided throughout the campus.*

Guidelines), as amended.[2,3] An Environmental Assessment Form (EAF) and Initial Study were prepared. The Lead Agency subsequently made the determination that an EIR would be required.

The Buckley School Campus Enhancement Plan described herein has evolved from a planning and design process dating back to 1997 that has included extensive community input. The project has undergone numerous revisions over the years and the School has continued to work with the community to address their concerns while accommodating the School's educational needs. The Buckley School filed an application in 1997 for a new CUP for the Campus Master Plan that would have increased student enrollment to 975 students. Processing of the plan was suspended in 1999, and it was withdrawn in 2001. In 2003, prior to submitting any formal applications to the City, The Buckley School presented a preliminary conceptual plan for new facilities to various community members. In response to community comments, The Buckley School made further refinements to its proposal. In August 2004, The Buckley School provided a revised proposal to the surrounding community. Subsequently, an EAF was filed with the City of Los Angeles for the proposed project, which reflected further refinements made to that revised proposal. In accordance with CEQA, an Initial Study was then prepared for the project and a Notice of Preparation (NOP) requesting comments to be considered in a Draft EIR was circulated from January 12, 2005, through February 11, 2005. A public Scoping Meeting to receive comments on the project was held on January 25, 2005. Comments received during the 2005 NOP circulation period and at the Scoping Meeting are included in Appendix A of this EIR.

Most recently, in response to the plan described in the November 2004 EAF/Draft Initial Study and the NOP dated January 12, 2005, some members of the community expressed concerns particularly regarding construction impacts and soil export. In an effort to address such comments and reduce associated environmental impacts, the project has been revised. A new Initial Study was prepared for the project and an NOP requesting comments to be considered in a Draft EIR was circulated from February 10, 2006, through March 13, 2006. Comments received during this most recent NOP circulation period are included in Appendix B of this EIR.

In accordance with Section 15121 of the State CEQA Guidelines, the purpose of this EIR is to identify all potentially significant effects of the project on the physical environment, to determine the extent to which those effects can be reduced or avoided and to identify and evaluate feasible alternatives to the project as proposed. Agency decision-makers will then use this information to take appropriate action on the project. The EIR, in itself, will not determine whether the proposed project will be approved.

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2 *Public Resources Code Sections 21000-21178.*

3 *California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.*

Based on the Initial Study, it was determined that implementation of the proposed project may, either by itself or in conjunction with past, present, and reasonably foreseeable future development in the vicinity, have significant effects in the following areas: Aesthetics; Air Quality; Biological Resources; Cultural Resources; Geology/Seismic Hazards; Hazardous Materials; Hydrology/Surface Water Quality; Land Use; Noise; and Transportation and Circulation. This EIR includes analysis of the above environmental topics. Mitigation measures are provided to reduce potentially significant impacts. In accordance with CEQA Guidelines Section 15128, the Initial Study for the project indicates the reasons that other possible effects of the project were determined not to be significant and are, therefore, not discussed in further detail in this EIR.

C. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the City's decision-makers include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas include aesthetics, air quality, noise, and traffic, all of which would be construction-related. Additional issues known to be of concern in the community include potential noise, traffic, and access impacts associated with operation of the project.

D. ALTERNATIVES TO REDUCE OR AVOID SIGNIFICANT EFFECTS

The City of Los Angeles and State CEQA Guidelines Section 15126.6 require that an EIR describe a range of reasonable alternatives, including a no project alternative that would feasibly attain most of the basic project objectives and would avoid or substantially lessen any of the significant environmental effects of the project. CEQA Guidelines state that only those alternatives necessary to permit a "reasoned choice" are required to be set forth in order to foster meaningful public participation and informed decision making. Based on the analysis of alternatives, an environmentally superior alternative is designated. A complete analysis of alternatives to the project is provided in Section V of this EIR.

The following alternatives to the proposed Buckley School Campus Enhancement Plan were evaluated in this EIR and are summarized below: Alternative A—No Project/No Build Alternative; Alternative B—Alternative Use (All Residential) Alternative; Alternative C—Single Level Parking Facility Alternative; Alternative D—No Parking Facility Alternative; and Alternative E—Previous Project Alternative. A complete description of each alternative and the underlying assumptions made in defining them is provided in Section V of this EIR.

Alternative A—No Project/No Build Alternative: The No Project/No Build Alternative assumes that the project would not be approved and no new development would occur within the project site. Thus, the physical and operational conditions of the School would remain as they are today.

Implementation of the No Project/No Build Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to the project. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would be avoided under this Alternative. Relative to the project objectives established in Section II, Project Description, of this EIR, under the No Project/No Build Alternative, the vast majority of the objectives established for the project would not be attained, although most of the objectives pertaining to construction and minimization of impacts would be met to a greater degree as compared with the proposed project.

Alternative B—Alternative Use (All Residential) Alternative: Under the Alternative Use Alternative, the project would not be approved, The Buckley School would cease operations, and new development consisting of 11 large-scale single-family residences and related infrastructure such as roadways, utility lines, and related facilities would be introduced. All existing school facilities, including approximately 99,150 square feet of building area and the associated athletic field and play areas, would be demolished.

Implementation of this Alternative would result in similar or reduced environmental impacts for most issue areas as compared to the proposed project. While some issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative. Relative to the project objectives established in Section II, Project Description, of this EIR, the Alternative Use Alternative would not achieve any of the project's educational objectives and would not meet many of the site planning objectives. Furthermore, this Alternative may not achieve many of the Community Plan and Specific Plan objectives to the extent that the proposed project would.

Alternative C—Single Level Parking Facility Alternative: The Single Level Parking Facility Alternative assumes that similar improvements to academic facilities proposed under the project would be implemented, along with the proposed increase in student enrollment. However, under the Single Level Parking Facility Alternative, the proposed Parking Facility would consist of a single enclosed level, which in combination with surface parking lots located throughout the campus would provide approximately 306 parking spaces on-site. The main campus entrance would be reconfigured to create a circular arrival plaza, similar to that proposed for the project, allowing for bus queuing as well as access to the Parking Facility. A few of the improvements to campus athletic facilities, school operations, and the site's aesthetic character that are proposed as part of the project would not be implemented under this Alternative. Maximum building heights under the Single Level Parking Facility Alternative would be 45 feet from existing grade, based on the LAMC definition of building height, and most of the approvals sought for the project would be required for this Alternative. Additionally, this Alternative would involve earthwork quantities similar to that of the project.

Implementation of the Single Level Parking Facility Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project. While several issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative. While CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project, as discussed further in Section V, Alternatives, of this EIR the Single Level Parking Facility Alternative has been included in response to community concerns regarding the proposed parking facility and building heights under the project.

Relative to the project objectives established in Section II, Project Description, of this EIR, the Single Level Parking Facility Alternative would achieve most, but not all, of the project's educational objectives and all of the Community Plan and Specific Plan objectives. The Alternative would also meet most, but not all, of the project's site design and community objectives. However, several of the objectives that would not be met to the same extent as the project are considered crucial to the proposal, including containing all vehicle queuing and student drop-off/pick-up within the campus and respecting the residential character of the surrounding neighborhood.

Alternative D—No Parking Facility Alternative: The No Parking Facility Alternative assumes that the proposed project improvements to academic facilities at the Buckley School would be implemented, along with the proposed increase in student enrollment. However, under the No Parking Facility Alternative, the proposed enclosed Parking Facility would not be developed as part of the Middle and Upper School Main Academic Center, and approximately 306 parking spaces would be provided on-site in surface lots located throughout the campus. In addition to changes in campus parking and internal circulation, several of the improvements to campus athletic facilities, school operations, and the site's aesthetic character that are proposed as part of the project would not be implemented under this Alternative. Maximum building heights under the No Parking Facility Alternative would be 45 feet from existing grade, based on the LAMC definition of building height, and most of the approvals sought for the project would be required for this Alternative. Additionally, this Alternative would involve earthwork quantities on-site similar to that of the project, plus approximately 15,815 cubic yards of soil import.

Implementation of the No Parking Facility Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project. While several issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., construction-related aesthetics, air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative. While CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project, as discussed further in Section V, Alternatives, of this EIR the No Parking Facility Alternative has been included in response to community concerns regarding the proposed parking facility and building heights under the project.

Relative to the project objectives established in Section II, Project Description, of this EIR, the No Parking Facility Alternative would achieve many, but not all, of the project's educational objectives and most of the Community Plan and Specific Plan objectives. The Alternative would meet many of the project's site design and community objectives, but due to its access, circulation, and parking configuration, would not achieve several important project objectives.

Alternative E—Previous Project Alternative: The Previous Project Alternative resembles a development proposal described in the November 2004 EAF/Draft Initial Study and the Notice of Preparation dated January 12, 2005. Like the proposed project, this Alternative would provide for new teaching space, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The Alternative would also provide for the modernization of existing facilities, improved disabled access, seismic retrofits, and energy efficiency upgrades. The plan would involve the demolition, construction, expansion, and renovation of various buildings on-site (the Lower School buildings in particular), as well as vehicular circulation and queuing improvements and increased parking within a new semi-subterranean parking facility. Upon completion, a net addition of approximately 53,750 square feet of building area would be provided, resulting in a total of 152,900 square feet of educational facilities within the project site. Additionally, a new two-level semi-subterranean parking facility would be constructed beneath the Lower/Middle School Classroom building, providing a total of 306 spaces on-site. Maximum building heights under the Previous Project Alternative would be 40 feet from existing grade, based on the LAMC definition of building height, and most of the approvals sought for the project would be required for this Alternative. Additionally, this Alternative would necessitate substantially more earthwork than the project, or specifically approximately 66,700 cubic yards of cut, 15,250 cubic yards of fill, and the export of approximately 51,450 cubic yards.

Implementation of the Previous Project Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project, and reduced impacts for a few issue areas compared to the project. While several issue areas would have greater impacts under the Alternative, none of the greater impacts would involve new significant impacts. Additionally, most of the significant and unavoidable impacts (i.e., construction-related air quality, noise, and transportation/circulation) associated with the proposed project would also occur under this Alternative, with the exception of temporary aesthetic impacts during construction, which would be avoided under this Alternative. As previously mentioned, CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project. While the Previous Project Alternative would reduce only a few of the proposed project's impacts, as discussed further in Section V, Alternatives, of this EIR this Alternative has been included in order to provide an analytical comparison of the development proposal described in the November 2004 EAF/Draft Initial Study and January 12, 2005 NOP with the currently proposed project, which was defined in response to community concerns and input regarding the previous proposal. In particular, the project as currently proposed was developed in an effort to address public comments regarding construction impacts and soil export associated with the previous proposal and to reduce related environmental impacts.

Relative to the project objectives established in Section II, Project Description, of this EIR, while the Previous Project Alternative would achieve all of the educational objectives, this Alternative would not achieve the site design and community objectives nor the Community Plan and Specific Plan objectives to the extent that the project would. Specifically, the objectives pertaining to construction and minimization of impacts would not be met under this Alternative.

Environmentally Superior Alternative: Of the Alternatives analyzed in the EIR, the No Project/No Build Alternative is considered the overall environmentally superior alternative as it would reduce the vast majority of the significant or potentially significant impacts occurring under the proposed project to no impact or levels that are less than significant. However, this Alternative would not meet most of the educational, site design, community, Community Plan or Specific Plan objectives established for the proposed project (although the objectives pertaining to construction and minimization of impacts would be met to a greater degree as compared with the proposed project due to the absence of any construction activities under the No Project/No Build Alternative). In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Alternative Use Alternative would be environmentally superior. This Alternative would reduce more of the project impacts than any of the other remaining alternatives. Two of these reduced impacts, operational noise and operational traffic, would be less than significant without mitigation, as opposed to less than significant with mitigation as under the project. However, none of the project's significant and unavoidable impacts would be reduced or eliminated under this Alternative.

Under the Alternative Use Alternative, the Buckley School would cease operations and the site would undergo a major change in use and development. Thus, this Alternative would not meet the underlying purpose of the project, nor would it achieve any of the project's educational objectives. The Alternative Use Alternative also would not meet many of the site planning objectives, nor achieve many of the Community Plan and Specific Plan objectives to the extent that the project would. Regardless, the Alternative Use Alternative would be considered environmentally superior to any of the other alternatives evaluated in this EIR.

E. SUMMARY OF PROJECT IMPACTS

1. AESTHETICS

a. Environmental Impacts:

(1) Visual Character

The project has been designed to make use of previously developed areas of the campus, integrating new structures with existing development and minimizing effects on the slopes of the canyon, the natural vegetation, and existing open space areas. Proposed development would be similar in terms of land use and site layout to the existing school campus, and the new building architecture would represent updated designs compatible with the existing building styles. The new buildings would have similar perceived heights (i.e., relative to finished grade) and similar roofline heights as existing development, and the massing of new square footage would be articulated to reduce the massing of structures. The proposed project also includes an extensive landscape plan designed to buffer campus development from the surrounding residences, promote a green campus complementary to the canyon, and enhance appreciation for the natural setting of the campus. Notable site features such as the existing Bell Tower would remain in place, and the existing turtle pond would likely be recreated near its current location as part of the project. In addition, the existing pole-mounted, changeable message sign located near the campus exit would be removed, which would be considered a beneficial impact relative to the visual character of the campus. In summary, the project would not substantially alter the visual character of the campus or community, would not convert large areas of natural open space, would not create an inappropriate contrast between project elements and the area's valued aesthetic image, would not permanently remove existing valued visual features or elements, and would not present substantial inconsistencies with applicable goals and policies of the Community Plan. As such, project design would not conflict with or exceed the significance thresholds specified for aesthetic impacts. As such, the impact of the project itself (i.e., post-project conditions) on aesthetics would be less than significant.

Construction activities on-site would result in short-term changes in existing structures and exterior areas, causing a noticeable change in the site's appearance. Visible construction activities would include the removal of existing structures, site preparation and grading, construction of new structures, and installation of new utilities, amenities, and landscaping. During these activities, equipment and materials may be stored on-site, and temporary facilities, such as portable toilets and construction offices, may be used. The most noticeable visual change would be the temporary classroom bungalows (modular units) planned within the athletic field area, as well as in a small area immediately north of the Academic Building South, that would remain for approximately 18 months during construction of Phase 2 (primarily during the 2010–2011 school year).[4] Following their temporary use, the bungalows would be removed and the athletic field restored. Thus, proposed construction activities may result in a temporary aesthetic impact to nearby uses, particularly the residences to the west. While the evaluation of aesthetics is inherently influenced by a degree of subjectivity, to be conservative, it has been assumed that the introduction and use of the classroom bungalows would pose substantial temporary visual discord with the surrounding environment, resulting in a temporary significant aesthetic impact during construction.

(2) Views

The nature and quality of views from Mulholland Drive, a designated Scenic Parkway in the Mulholland Scenic Parkway Specific Plan, would not be negatively impacted by the project. Specifically, given the location of the project site within relatively level portions of the lower area of a canyon and the site's distance from Mulholland Drive, campus development would not obstruct views of the valley beyond or the mountains in the distance. The baseball diamond within the athletic field in the southern portion of the campus would continue to the most prominent site feature visible from Mulholland Drive, and the school buildings would continue to appear small and unobtrusive, situated among trees and landscaping. In general, the project would blend into the existing campus setting. Since proposed development would have similar building heights (in terms of rooflines), building scale, and architectural elements (e.g., courtyards and roof materials) as existing structures on-site and since additional landscaping would be provided throughout the campus, views of the site from a distance would not appear noticeably altered. No structures would abut or rise above Mulholland Drive, interrupt prominent ridgelines, or block views of other valued visual resources such as the San Fernando Valley and Santa Susana Mountains to the more distant north. As such, implementation of the Campus Enhancement Plan would not substantially obstruct a recognized or valued view currently enjoyed from the scenic corridor, and impacts would be less than significant.

[4] *One modular unit would be located adjacent to the Academic Building South and would be used for food service during construction of Phases 1 and 2.*

Additionally, views of campus development, where available from locations within Fossil Ridge Park, would not change significantly. Such views would continue to be intermittent at best due to heavy vegetation throughout the park and as such, impacts would be less than significant. Furthermore, the nature and quality of views from local residential streets would not change substantially as a result of project implementation. New elements associated with the project would not substantially obstruct any recognized or valued view, and views of the site from a distance, in particular, would not appear noticeably altered. View impacts would be less than significant.

(3) Light and Glare

Implementation of the proposed project would not substantially increase ambient light levels on the project site and in the immediately surrounding vicinity. Project-related lighting would consist of low-level point light sources. All light would be directed inwards and downward with shielding as appropriate, in order to minimize light spillover. Additionally, the athletic field and recreational amenities in the southern portion of the project site would not be lit except for low-level security and exit lighting. Thus, the project would not introduce new sources of light, and impacts associated with lighting would be less than significant.

Glare effects also would not be expected to increase under the project. Glare reflected from parked vehicles on-site would be reduced with removal of the main northern surface parking lot and the introduction of enclosed structured parking. Additionally, the proposed building façade materials would generally be non-reflective. The only notable new source of glare would be the proposed swimming pool surface, which would be shielded by the associated Aquatic Center building and perimeter landscaped screening. Since the project would not include highly reflective surfaces, glare impacts would be less than significant.

(4) Regulatory Consistency

The proposed project would be generally consistent with applicable requirements set forth by the Mulholland Scenic Parkway Specific Plan (MSPSP), the MSPSP Design and Preservation Guidelines, and the Los Angeles Municipal Code (LAMC). The project would require a Specific Plan Exception for relief from the MSPSP to allow facility expansion and operation of an existing school use within the Specific Plan's Outer Corridor, as well as a Specific Plan Exception to allow some buildings heights to exceed the maximum 40 feet allowed within the Outer Corridor. The project also proposes a modification of the height regulations pursuant to LAMC §12.24F (discussed further in Section IV.H, Land Use) to allow some building heights to exceed the maximum 36 feet permitted in a residential hillside zone. Approval from the Mulholland Scenic Parkway Design Review Board would also be required for the proposed outdoor Aquatic Center to be developed within the MSPSP area.

More specifically, the Specific Plan Exception for relief from the MSPSP to allow facility expansion and operation of an existing school use within the Outer Corridor would allow construction of the project. Insofar as school facilities currently exist within the Outer Corridor, the project would not represent a change in conditions. The approvals relating to buildings heights would be necessary since proposed building heights would range from approximately 18 feet up to a maximum of 55 feet. In essence, two proposed buildings, the Middle and Upper School Main Academic Center (maximum 55-foot height) and the Academic Building West (maximum 39-foot height), would exceed the 36-foot LAMC height limit and/or the 40-foot MSPSP limit for development within the Outer Corridor.[5] However, the Main Academic Center would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project.[6] Similarly, the Academic Building West would visually appear no greater than 32 feet as measured from finished grade. All other proposed buildings would fall within the 36-foot height limit specified by the City's hillside requirements as well as the MSPSP 40-foot limit. In any case, nearly all of the new structures would have heights that are similar to existing building heights on-site. Furthermore, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[7] The proposed project would also be subject to provisions of the City's Protected Tree Ordinance No. 177,404. The protected trees to be removed would be replaced on at least a two-to-one basis in accordance with the Protected Tree Ordinance. With the requested approvals, the project would not present substantial inconsistencies with regulations applicable to aesthetics, and significant impacts would not occur.

Further analysis of impacts related to visual resources, views, and illumination is provided in Section IV.A. of this EIR.

b. Cumulative Impacts

None of the related projects are located adjacent to the project site or within the natural canyon in which the campus is situated. While potential mid- to high-rise structures in the surrounding area may be visible from vantage points within the project site or on adjacent

[5] *In addition, two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

[6] *A 55-foot maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import.*

[7] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

roadways, due to the relatively flat topography of the valley to the north of the site and the urbanized nature of the area, the related projects will not likely be prominent in views from the site or the immediately surrounding area. None of the related projects is expected to appreciably alter the urban character of the area. Additionally, the related projects are located sufficiently distant from the project site so as not to increase ambient light levels in the immediate project area. In any case, each related project would be analyzed on a case-by-case basis to determine its impact on aesthetics, views, and light and glare. Furthermore, the project's impacts on aesthetics, views, and light and glare would be less than significant, with the exception of temporary aesthetic impacts during construction on-site. Overall, development of the related projects in the surrounding area, in combination with the proposed project, would result in a cumulative aesthetic impact on aesthetics and views that is less than significant.

c. Mitigation Measures

Mitigation Measure A-1: All open areas not used for buildings, driveways, parking areas, athletic facilities or walkways shall be landscaped and maintained to reduce visibility of the project improvements from adjacent residences in accordance with a Landscape Plan to be prepared by a licensed landscape architect to the satisfaction of the City Planning Department. Remaining existing natural landscape areas shall be retained and maintained in accordance with the landscape plan.

Mitigation Measure A-2: Nighttime lighting for use of the athletic field and outdoor courts shall be prohibited, except as required for low level security and exiting purposes.

d. Level of Significance After Mitigation

With implementation of the project features described above, the proposed project would not result in significant impacts relative to aesthetics, views, light or glare, with the exception of temporary aesthetic impacts during construction. Implementation of Mitigation Measures A-1 and A-2 above would serve to further reduce potential impacts. Construction impacts would be short-term, significant and unavoidable due to the perceived visual discord posed by the temporary classroom bungalows.

2. AIR QUALITY

a. Environmental Impacts

(1) Construction

The maximum regional emissions during construction activities would occur during Phase 2 construction of the new Middle and Upper School Main Academic Center building and enclosed Parking Facility. As detailed in Section IV.B, Air Quality, maximum regional construction emissions would not exceed the South Coast Air Quality Management District (SCAQMD) daily significance thresholds for Particulate Matter (PM_{10}), Carbon Monoxide (CO), Volatile Organic Compounds (VOC) or Sulfur Oxides (SO_X). However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for Nitrogen Oxides (NO_X). Therefore, regional construction emissions resulting from the project would result in a significant short-term impact.

During construction, the unmitigated maximum daily localized emissions would not exceed the localized screening thresholds for CO or NO_X during any phase. However, the maximum localized emissions would exceed the localized screening thresholds for PM_{10} during site preparation activities for Phase 2. As such, construction activity would result in a short-term localized PM_{10} impact to sensitive receptors in close proximity to the project site, including students attending The Buckley School.

(2) Operation

To calculate regional emissions solely attributable to operation of the project, emissions from new vehicle trips associated with the project were combined with stationary emissions generated by additional building square footage associated with the project. Regional emissions resulting from operation of the project are expected to be well below the SCAQMD thresholds for all criteria pollutants. In addition, emissions may even be lower with implementation of the Transportation Demand Management (TDM) Plan goal of achieving a zero net increase in vehicular trips.

With regard to local CO impacts, project-related traffic is not anticipated to result in any exceedances of the State one-hour CO standard of 20 ppm at the study intersection during the A.M., School P.M., or commuter P.M. peak periods. Similarly, eight-hour CO concentrations would remain below the State standard of 9 ppm. Since significant impacts would not occur at the intersections with the highest potential for CO hotspot formation, no significant impacts are anticipated to occur at any other locations in the project vicinity as a result of the proposed project, since the components yielding CO hotspots would not be greater than those occurring at the analyzed intersection.

The project does not include any uses identified by the SCAQMD as being associated with odors and as such would have no impact related to objectionable odors. In addition, the project is consistent with adopted air quality plans and polices and would not have a significant cumulative impact on air quality. Therefore, operation of the project following construction would not have a significant and unavoidable impact on air quality.

b. Cumulative Impacts

The SCAQMD's approach for assessing cumulative impacts is based on its Air Quality Management Plan (AQMP) forecasts for attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts, taking into account the Southern California Association of Governments' (SCAG) forecasted future regional growth and determining whether the project is consistent with the forecasted future regional growth. Therefore, if all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur. Cumulative air quality impacts for the project were evaluated in the context of Los Angeles County as a whole for the projected operational buildout year of 2014, consistent with the SCAQMD's methodology.

Based on the SCAQMD's methodology (presented in Chapter 9 of the CEQA Air Quality Handbook), a project would have a significant cumulative air quality impact if the ratio of daily project employee vehicle miles traveled to daily countywide vehicle miles traveled exceeds the ratio of daily project employees to daily countywide employees. An assessment of the project's cumulative impacts associated with the project is presented in Section IV.B, Air Quality, of this Draft EIR. As shown, the project employee-related rate of growth in vehicle miles traveled would not be greater than the project-related rate of growth in employment. In addition, cumulative traffic would not result in any local CO violations at the studied intersection. Therefore, the project would not have a significant cumulative impact on air quality

c. Mitigation Measures

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the project's air quality impacts.

Mitigation Measure B-1: In addition to SCAQMD Rule 403 requirements, all land clearing/earth-moving activity areas shall be watered as necessary to remain visibly moist during active operations.

Mitigation Measure B-2: All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite.

Mitigation Measure B-3: Streets shall be swept as needed during construction, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

Mitigation Measure B-4: Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Mitigation Measure B-5: Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

Mitigation Measure B-6: Establish an on-site construction equipment staging area and construction worker parking lots, located on either paved surfaces or unpaved surfaces subject to soil stabilization.

Mitigation Measure B-7: Traffic speeds on all unpaved roads shall not exceed 15 mph.

Mitigation Measure B-8: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure B-9: To the extent possible, petroleum powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

Mitigation Measure B-10: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Mitigation Measure B-11: General contractors shall maintain and operate construction equipment such that exhaust emissions are minimized. For example, engines shall be turned off while in queues or while loading/unloading. In addition, heavy equipment and petroleum-powered generators shall be turned off when not in use.

Mitigation Measure B-12: Petroleum-powered equipment shall be turned off during second-stage smog alerts.

Mitigation Measure B-13: Develop a construction traffic management plan that includes, but is not limited to: (1) consolidating truck deliveries; (2) providing a rideshare or shuttle service for construction workers; and (3) providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

Mitigation Measure B-14: The project shall include energy-saving double-glazed windows in all new structures to the extent feasible.

Mitigation Measure B-15: Outdoor activities of children on-site and school scheduling shall be coordinated to prevent undue exposure of students to active demolition and site grading activities.

d. Level of Significance After Mitigation

(1) Construction

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, the project would remain in exceedance of the SCAQMD regional significance thresholds for NOx during the most intense construction period. As such, project construction would continue to result in a significant regional impact even with incorporation of all feasible mitigation measures.

Implementation of the mitigation measures described above would reduce localized PM_{10} emissions by 30 percent. However, the project would remain in exceedance of the SCAQMD localized significance threshold (LST) screening table threshold value for Phase 2 construction. Therefore, a refined localized analysis was conducted to determine the extent of the impact. The Industrial Source Complex Short Term (ISCST) model was run using the SCAQMD mandated 1981 meteorological data from the Burbank Monitoring Station and provided on the SCAQMD web site (www.aqmd.gov). As indicated in the model, construction-related PM_{10} levels would exceed the localized concentration increase threshold of 10.4 µg/m3 during Phase 2 site preparation activities. The maximum localized PM_{10} concentration during Phase 2 activity would be located along Camino de la Cumbre with a concentration of 35.6 µg/m3. The ISCST modeled potential impacts are based on a set of conservative assumptions that incorporate worst-case 1981 SCAQMD mandated meteorological conditions and maximum daily PM_{10} emissions occurring every day throughout the entire modeled year. Therefore, if grading activities during Phase 2 occurred for the entire year, although they are expected to occur only for three months, at the maximum rate of activity, the model predicts that one day out of 365 days an off-site PM_{10} concentration could be as high as 35.6 µg/m3.

Actual construction activities on average would typically operate at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled predicted set of conservative assumptions likely overstates the potential localized impacts, but is still concluded to remain significant and unavoidable even with incorporation of all feasible mitigation measures.

(2) Operation

During the operational phase, the project would not result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_X, PM_{10}, and VOC. Project traffic during the operational phase of the project would not cause an exceedance of the State or federal standards and no significant impacts to local CO concentrations would occur. The project would also not result in any localized impacts related to air toxic emissions as the School is limited to small sources of air toxic emissions (e.g., consumer products and diesel particulates from school buses) and no substantial sources of air toxic emissions are near the School that could significantly impact sensitive receptors at or near the project site. The project does not include any uses identified by the SCAQMD as being associated with odors and as such would have no impact related to objectionable odors. In addition, the project is consistent with adopted air quality plans and polices and would not have a significant cumulative impact on air quality. Therefore, operation of the project following construction would not have a significant and unavoidable impact on air quality.

3. BIOLOGICAL RESOURCES

a. Environmental Impacts

The proposed project would generally be constructed within areas of the site that are currently developed and/or landscaped. Based on the review of relevant literature, the review of data on sensitive habitats and species in the region (e.g., the California Natural Diversity Database (CNDDB)), the presence of a limited amount native vegetation within the area to be developed, the location of proposed development within currently developed areas, and the abundance of non-native ornamental landscaping, the project would not result in the loss of wildlife individuals, or the reduction of existing habitat, of a local, State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern. In addition, given the general lack of sensitive species on the project site and the existing developed nature of the site, the proposed project would not interfere with habitat use (directly or indirectly) such that normal species' behaviors are disturbed to the degree that may diminish the chances for long-term survival of a sensitive species. Thus, such impacts would be less than significant.

During site visits conducted for the project, PCR biologists examined the project site for evidence of streams and an ordinary high water mark (OHWM), saturation, and/or wetland vegetation. Three drainages were found within the immediate vicinity of the site that would be considered under the jurisdiction of the Army Corps of Engineers (ACOE) and California Department of Fish and Game (CDFG). These areas support 0.01 acre of ACOE "Waters of the U.S." and 0.14 acre of CDFG "Waters of the State," but do not support wetlands. Construction of the proposed project would not extend over any of the ACOE jurisdictional "Waters of the U.S." or the CDFG jurisdictional streambed and associated riparian habitat. Therefore, no impacts to these jurisdictional waters would occur. No wetlands were observed on-site, therefore no impacts will occur to wetland habitat.

The project site occurs within an area that supports local wildlife movement for more ubiquitous, development-adapted species and is known to support mule deer on the slopes in the eastern and southern portions of the project site. These species likely utilize the native habitat for foraging and for cover. However, the project site would not support regional north-south or east-west movement between larger habitat areas due to the presence of dense urban development north of the project site and residential development east and west of the project site. Furthermore, since the proposed project is occurring within already developed areas of the current campus, the proposed project is not expected to interfere with wildlife movement or migration corridors such that the chances for long-term survival of any species, sensitive or otherwise, would be diminished. Thus, potential impacts to wildlife corridors would be less than significant.

A total of 57 trees will be directly impacted by the proposed project. These trees would require removal and include up to 18 native trees (4 coast live oak trees, and 14 California walnut trees) and 39 non-native trees. None of the 57 trees proposed for removal are recommended for transplanting. A total of 44 trees will be partially impacted by the proposed project, including 20 native trees (5 coast live oak trees, 13 California walnut trees, and 2 California sycamore trees) and 24 non-native trees.[8] These trees would not be removed, but require protective measures during construction. An additional 26 trees would be potentially impacted but not to a point that the tree would need to be removed. These include 11 native trees (7 coast live oak and 4 California walnut trees) and 15 non-native trees. As discussed in the Tree Survey Report, 49 native trees within the survey area and 48 non-native trees within the survey

8 *Partially impacted trees include trees which may be impacted within the 5' buffer zone of the tree canopy.*

area would be avoided by the proposed improvements. The mitigation measures provided below would ensure that the 70 partially and potentially impacted trees are protected during construction. With implementation of the mitigation measures provided below, impacts to protected trees would be reduced to less than significant levels.

The study area supports many trees which could be used by breeding raptors and songbirds. Nesting activity typically occurs from February 15 to August 31. To protect nesting birds regulated by the Migratory Bird Treaty Act (MBTA), efforts will be made to schedule all removals between September 1 and February 14 to avoid the nesting season. In addition, the mitigation measure provided below would ensure that impacts to nesting birds would be less than significant.

b. Cumulative Impacts

The related projects listed in this EIR would generally consist of infill development. Therefore, biological resources would not be impacted to a measurable degree, as such work would largely occur on previously disturbed land. Related projects would be analyzed on a case-by-case basis for their impacts to native trees, including oak trees, pursuant to City of Los Angeles Protected Tree Ordinance. Thus, no significant cumulative impact to biological resources would occur.

c. Mitigation Measures

Mitigation Measure C-1: Trees removed that are protected by the City of Los Angeles Protected Tree Ordinance shall be replaced within the property by at least two trees of a protected variety including valley and coast live oak, or any other tree of the quercus genus (excluding scrub oak), the California Walnut, the California sycamore, and the California bay. Each replacement tree shall be a 15-gallon, or larger specimen in size, measuring one inch or more in diameter at a point one foot above the base, and not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

Mitigation Measure C-2: All construction work potentially impacting any protected tree shall be approved by, performed under the supervision of, and inspected by a tree expert as defined by the City of Los Angeles Protected Tree Ordinance. This tree expert shall also oversee all maintenance work on the protected trees including irrigation, pruning and spraying.

Mitigation Measure C-3: Ongoing during construction, the construction supervisor shall ensure that all construction employees are fully informed of the tree protection practices. This shall include information on the tree protection zone, the necessity of preventing damage, and the discussion of work practices that will accomplish such.

Mitigation Measure C-4: Ongoing during construction, six-foot-high, brightly colored construction fencing shall be erected along the construction side of partially and potentially impacted native trees to delineate the tree protection area. The protective fence shall be installed 5 feet outside of the tree's drip line, if possible. If construction is to occur within the drip line, the fencing shall be installed 12 inches inside the new footing or trenching line.

Mitigation Measure C-5: Due to some sizeable trees and shrubs occurring within and adjacent to the Site, removal of any large trees and large branching shrubs shall take place outside of the nesting season (February 15-August 31) in accordance with the MBTA. If such removal activities must occur during the nesting season, a biological monitor shall be present during the removal activities to ensure that no active nests will be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) shall be established until the fledglings have left the nest or it has been determined that the nest has failed.

d. Level of Significance After Mitigation

With incorporation of the mitigation measures outlined above, no significant impacts to biological resources would occur as a result of the proposed project.

4. CULTURAL RESOURCES

a. Environmental Impacts

A records search by the Southern Central Coast Information Center (SCCIC) at California State University Fullerton indicates that deep excavations or any type of construction-related activities in the bedrock may result in a high probability of encountering remains of fossil marine vertebrates. Therefore, as excavation and construction into the bedrock may be required, implementation of the project does have the potential to result in significant adverse impacts associated with the permanent loss of, or loss of access to, a paleontological resource. However, with implementation of the proposed mitigation measures presented below, potential impacts would be reduced to less than significant levels.

b. Cumulative Impacts

From a cumulative impact perspective, grading and excavation activities associated with the project in combination with other related projects in the project vicinity could contribute to the progressive loss of fossil remains, as-yet unrecorded fossil sites, associated geologic and geographic site data, and fossil-bearing strata. However, as described below, with implementation of the proposed mitigation measures, project impacts would be less than significant. It would also be expected that other related projects would implement such mitigation measures on a case-by-case basis if deemed appropriate as part of their environmental review. Thus, with implementation of the mitigation measures listed above, cumulative impacts associated with paleontological resources would be less than significant.

c. Mitigation Measures

Mitigation Measure D-1: A qualified paleontologist shall be retained by the applicant and approved by the lead agency to oversee and carryout the mitigation measures stipulated in this EIR. The services of the paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County.

Mitigation Measure D-2: Prior to the start of constructed-related activities, construction personnel involved with earth-moving activities shall be informed by the paleontologist of the potential for encountering significant paleontological resources, instructed on the proper notification procedures when such an encounter occurs, and taught how to identify fossils and other potential resources. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of paleontological resources protection. Construction personnel shall also be informed that unauthorized collection of fossil resources is prohibited.

Mitigation Measure D-3: Prior to the start of construction, the paleontologist shall conduct a field survey of exposures of sensitive stratigraphic units within the construction site(s) that will be disturbed by excavation and construction activities such as drilling and/or pile driving. Earth-moving construction activities at depths determined by the paleontologist to be sensitive will be periodically monitored where such activity may disturb or encounter bedrock material of the marine Late Miocene Modelo Formation (Monterey Formation). The frequency of monitoring efforts will be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities; the type of construction-related activities, such as foundation pile driving/drilling; the materials being excavated; and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. Monitoring will not be conducted in areas where grading, excavation, and/or construction activities will not occur or in areas where exposed sediment will be buried, but not otherwise disturbed.

Mitigation Measure D-4: If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.

Mitigation Measure D-5: At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

Mitigation Measure D-6: Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository.

Mitigation Measure D-7: Any fossils collected should be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

Mitigation Measure D-8: Following the completion of the above tasks, the paleontologist shall prepare a report documenting the absence or discovery of fossil resources on-site. If fossils are found, the report shall summarize the results of the monitoring program, identify those fossils encountered, recovery and curation efforts, and the methodology used in these efforts, as well as describe the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and the required mitigation measures.

Level of Significance After Mitigation

The proposed paleontological resource mitigation measures would reduce, to a less than significant level, the direct, indirect, and cumulative adverse environmental impacts on paleontological resources that could result from project-related construction activities. Therefore, with implementation of the mitigation measures above, no significant unavoidable adverse paleontological impact is anticipated as a result of the proposed project.

5. GEOLOGY

a. Environmental Impacts

The nearest potentially active fault to the project site is the Santa Monica-Hollywood Fault located approximately 4.2 miles south of the site. As stated in the 1997 Uniform Building Code (UBC), the faults located nearest to the project site are classified as Type “B” faults.

The principal seismic hazard at the project site is strong groundshaking from earthquakes produced by local faults. Modern buildings are typically designed to minimize or eliminate safety risks associated with groundshaking, such as through the use of shear panels and reinforcement. Nonetheless, similar to other developments throughout southern California, implementation of the project would result in exposure of people on-site to a degree of seismic hazard risk associated with groundshaking. Construction in accordance with UBC and LAMC requirements would minimize such risks. In addition, the project would be constructed in accordance with the specific recommendations provided in the Geologic and Geotechnical Engineering Report, which is included as Appendix F. Thus, potential impacts associated with groundshaking would be reduced to the extent possible and would be less than significant.

The project site is not included within an area identified by the California Geologic Survey (CGS) or the City of Los Angeles as potentially containing liquefiable material. Due to the lack of a high groundwater table and the presence of fine-grained materials, the project site is not subject to liquefaction. Therefore, no significant impacts associated with liquefaction would occur.

With regard to landslides, site conditions are grossly stable from a geologic standpoint, and the natural slopes on-site do not exhibit signs of surficial slope failure. Furthermore, the project would implement site-specific geotechnical recommendations (provided in Appendix F) to ensure adequate slope stability. Therefore, potential impacts associated with seismically induced landsliding would be less than significant.

The project site is not located in the immediate vicinity of any large bodies of water. Accordingly, the potential for seiches or tsunamis at the site is low. Therefore, the proposed project would not be subject to the effects of seiches and tsunamis, and no significant impacts would occur.

The project site is located within approximately 1.5 miles of the Upper Stone Canyon Reservoir to the southwest. However, the project site is not located within its path of inundation. As such, the potential for seismically induced flooding to occur at the site is considered low.

Therefore, the proposed project would not be subject to seismically induced flooding, and no significant impacts would occur.

The potential for subsidence to affect new development on-site is low and should not affect those areas of the site where development has or will occur on compacted fill. Therefore, no significant impacts associated with subsidence would occur. Additionally, the expansion potential of the fill on the project site was determined to be in the very low to low range. Therefore, no significant impacts associated with expansive soils would occur.

One notable area proposed for cut and fill operations, along the existing access road through campus that would become a central pedestrian walkway/fire access route as part of the project, currently contains uncertified fill and alluvium over bedrock. Due to the depth of the existing fill and the presence of a public storm drain, it is not feasible to remove and re-compact the existing fill prior to raising the grade in this area. As such, a Building Code modification would be necessary in order to place new fill over the uncertified fill. Any permanent structures located over areas of uncertified fill would be founded on piles and derive support entirely from underlying bedrock, and as such, no permanent structures would be supported by uncertified fill.

As discussed in detail in Section IV.E, Geology of this EIR, heavy rainfall in early 2005 caused mudslides above Camino de la Cumbre (immediately west of and upslope from the campus). Mud and debris from these mudslides crossed the roadway and came to rest on the chain link fence along the School's property boundary. To prevent future occurrences such as these, the Geologic and Geotechnical Engineering Report recommends erosion control for those areas where concentrated off-site flows can carry mud and water onto the project site. As the School has no control with regard to maintaining adequate off-site drainage, off-site mudslides above Camino de la Cumbre could potentially reoccur. However, with the School's previous construction of the small berm and block wall, mudslide impacts to the project site itself would be less than significant.

Overall, the Geologic and Geotechnical Engineering Report concluded that construction of the proposed project is feasible from a geologic and soils engineering standpoint, provided that the standards and recommendations in the report are incorporated in the project plans and are implemented during construction. With implementation of the recommendations provided in the geotechnical report, as well as adherence to all applicable regulatory requirements, including the City's permitting and construction inspection procedures, project impacts relative to soil stability would be less than significant.

With regard to landform alteration, the project has been specifically designed so that grading would occur primarily on previously developed or graded areas. Thus, the project would not significantly modify the existing topography or the adjacent hillsides. With the incorporation of the project design features and additional site-specific geotechnical recommendations, the proposed project would not destroy, permanently cover, or materially or adversely modify a prominent geologic or topographic feature. Therefore, project implementation is not anticipated to result in significant impacts associated with landform alteration.

With regard to sedimentation and erosion, since the project would require cut and fill, soil erosion could potentially occur on-site. Specifically, grading, excavation, and other earth-moving activities could expose site soils to wind- or water-generated erosion. However, as described in Section IV.G, Hydrology, of this EIR, best management practices (BMPs), which would reduce and/or eliminate erosion potential, would be utilized as part of project development. As such, impacts associated with hazards from erosion would be less than significant.

With regard to mineral resources, according to the CGS, no mineral resources or important aggregate resources are located within the project site boundaries or in the project area. As such, no impacts to mineral resources would occur as a result of the project.

b. Cumulative Impacts

Impacts associated with geologic issues are generally associated with a specific project site or a particular localized area. None of the related projects are located within the immediate vicinity of the project site. Thus, cumulative geologic impacts resulting from the project and other related projects would not occur. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. However, all projects are required to comply with State and local regulations regarding seismic hazards. Adherence to these applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant.

c. Mitigation Measures

Mitigation Measure E-1: The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding general findings, the proposed swimming pool, foundation design, retaining walls, floor slabs, paving, drainage, waterproofing, plan review, site observations during construction, and construction site maintenance are provided on pages 13 through 22 of the Geologic and Geotechnical Engineering Report, prepared by The J. Byer Group, Inc. provided in Appendix F of this EIR.)

d. Level of Significance After Mitigation

With implementation of the proposed mitigation measure, significant impacts associated with geology and seismic hazards would not occur as a result of the proposed project.

6. HAZARDS AND HAZARDOUS MATERIALS

a. Environmental Impacts

Construction of the proposed project may involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, cleaning agents, and pesticides for landscaping purposes. These and all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturer's instructions. Therefore, impacts from the use of these hazardous substances during construction would be less than significant.

Nominal quantities of hazardous substances are currently used at the project site. These substances are associated with the operation and maintenance of buildings, surrounding landscape, basketball court, baseball field and the swimming pool, and operation of the science and art classes and print shop. The Phase I Environmental Site Assessment determined that the use of such hazardous substances is not an environmental concern. The use, storage, and disposal of all potentially hazardous materials would continue to be conducted in small quantities and in accordance with applicable laws and regulations and manufacturer's instructions for such products. Therefore, impacts associated with the use of these hazardous substances during operation would be less than significant.

Asbestos Containing Material (ACM) has been identified in the buildings located at the project site. As such, the demolition of or modifications to any of these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition activities. However, compliance with the regulatory framework (SCAQMD Rule 1403) would reduce potential impacts to a less than significant level.

Lead-based paints are known to be present in some limited areas of the school. However, the project would comply with Federal Occupational Safety and Health Administration (OSHA) Regulations (Title 8 CCR Section 1532.1 and 29 CFR 1926.62) for construction work involving potential lead exposure. Additionally, a mitigation measure is proposed to ensure that lead-based paint removal would be conducted by a certified lead containment contractor in compliance with applicable laws. Compliance with the regulatory framework and the mitigation measures below would ensure that impacts associated with removal of such materials would be less than significant.

A geophysical survey confirmed the presence of an anomaly that appears to be a waste oil Underground Storage Tank (UST) at the site of the former bus maintenance garage located near the Transportation Building. Any UST and associated piping and contamination encountered during construction would be removed prior to or during construction in compliance with applicable regulatory requirements under the oversight of the Los Angeles Fire Department (LAFD) and/or the Regional Water Quality Control Board (RWQCB). Compliance with such regulatory requirements as set forth in the mitigation measure below would reduce potential impacts to a less than significant level.

Recent soil sampling below a former 10,000-gallon gasoline UST removed from the surface parking area to the southwest of the science building revealed a concentration of methyl tert-butyl ether (MTBE) in one sample 20 feet below grade that exceeded the SSL. The Site Assessment Report recommends that no further action is required in regards to the former UST based on the impermeable soil lithology of the area and the distance from the soil contamination to the groundwater. It has been requested that RWQCB maintain case closure. In the event that MTBE impacted soils are encountered, compliance with the mitigation measures below would ensure that any potential impacts would be less than significant.

Emergency access to the site would continue to be provided via Stansbury Avenue and Camino de la Cumbre. In addition, emergency access within the site would be provided through the central portion of the site via the project's proposed pedestrian walkway, which would be maintained as a 20-foot clear Fire Department access route to accommodate emergency vehicles. The new arrival plaza and parking facility would improve access to the site and eliminate queuing along Stansbury Avenue, which in turn would facilitate the movement of emergency vehicles. In addition, new wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to eliminate an existing blind curve at the driveway. In the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. As part of these procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their children at the off-campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street, with an alternative evacuation area at the surface parking lot on Hazeltine and Ventura Boulevard. Thus, impacts associated with emergency access would be less than significant and no mitigation measures would be required.

b. Cumulative Impacts

All development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the simultaneous development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

c. Mitigation Measures

Mitigation Measure F-1: Prior to demolition of any structure, the project applicant shall abide by the requirements of SCAQMD Rule 1403 for asbestos-containing materials (ACMs).

Mitigation Measure F-2: Removal of ACMs shall be performed by a certified asbestos containment contractor prior to demolition.

Mitigation Measure F-3: Removal of lead-based paints during demolition shall be performed by a certified lead containment contractor in compliance with applicable laws.

Mitigation Measure F-4: Prior to or at the time that development of improvements in the vicinity of the potential UST within the former bus maintenance garage area occurs, the potential UST and any associated piping and contamination shall be investigated and removed and/or remediated in compliance with applicable regulatory requirements.

Mitigation Measure F-5: Any contaminated soil, subsurface features, or groundwater discovered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ or otherwise managed in accordance with the applicable regulatory requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected until the appropriate evaluation and response measures are implemented so as to render the area suitable for grading activities to resume.

Mitigation Measure F-6: Any contaminated soils that may be stockpiled on-site shall be stored in a manner such that underlying soils are not cross-contaminated using such measures as heavy-duty plastic sheathing under or on top of the stockpiled soil or other suitable methods. In addition, all stock-piled materials shall be protected to prevent material from being washed into the storm drains using such methods as use of sand bags around the material or other suitable methods. The management, treatment or disposal of all contaminated soils shall comply with all applicable federal, state, and local regulations related to hazardous waste.

d. Level of Significance After Mitigation

All potentially significant impacts would be less than significant with implementation of the mitigation measures outlined above.

7. HYDROLOGY

a. Environmental Impacts

(1) Construction

Project construction would involve an estimated 15,674 cubic yards (cy) of cut material and an estimated 15,674 cy of fill, with nominal (i.e., less than 1,000 cubic yards) of soil import and/or export for a nearly balanced site in terms of earthwork. As such, exposed soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site water activities to reduce airborne dust could contribute to pollutant loading in storm water runoff. However, the project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) general construction permit. In accordance with the requirements of the permit, the project would implement a Storm Water Pollution Prevention Plan (SWPPP), which would specify BMPs and erosion control measures to be used during construction to prevent storm water pollution. Such BMPs would eliminate or reduce pollutant levels in storm water runoff during construction. Thus, with compliance of SWPPP guidelines including implementation of BMPs as set forth in the Hydrology Study, construction-related impacts to hydrology and surface water quality would be less than significant.

(2) Operation

Project implementation would result in an approximate 14.6 percent increase in impervious area. Currently, the project site has a pre-project storm water runoff flow of 51.68 cfs during a 50-year storm event. Based on the Hydrology Study, the project's increase in impervious area would result in a post-development storm water runoff flow of 52.27 cfs, which represents a modest 1 percent increase in flow. The increase in flow would result in an estimated post-project discharge of 280 cfs and 377 cfs for the 51-inch line and the 57-inch line, respectively. Based on the maximum hydraulic capacity calculated for these pipes, the existing lines serving the site have available capacity to accommodate post-project flows. In addition, new minor drainage improvements such as new and/or modified swales, gutters, or drainage pipes would be provided on-site to ensure the proper flow of surface water to the 51-inch main line. Thus, the project's impacts on hydrology would be less than significant.

b. Cumulative Impacts

The 29 related projects in the project vicinity could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed project, all of the related projects would also be subject to State NPDES permit requirements for both construction and operation. Each project would be required to develop SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface water quality. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to assure that sufficient local and regional drainage capacity is available. Furthermore, none of the related projects are located within the project's watershed. Thus, cumulative impacts to hydrology and surface water quality would be less than significant.

c. Mitigation Measures

The proposed project would be subject to the regulatory requirements described above, including preparation of a SWPPP and compliance with the City's Standard Urban Storm Water Management Plan (SUSMP) requirements. Compliance with these requirements is mandated by law to ensure that impacts to hydrology and surface water quality are reduced to less than significant levels. As the proposed project is not anticipated to result in any significant impacts to hydrology and surface water quality, no mitigation measures would be required.

d. Level of Significance After Mitigation

Impacts to hydrology and surface water quality would be less than significant; therefore, no mitigation measures would be required.

8. LAND USE

a. Environmental Impacts

(1) Consistency with Local Plans and Applicable Policies

The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan designates the majority of The Buckley School campus for Minimum Density Residential uses, with a small portion of the campus located immediately east of Camino de la Cumbre designated for Very Low Residential uses. Continued use of the project site for school purposes would be consistent with the designated land use designations, as the corresponding RE-40 zone (discussed below) permits school uses by Conditional Use Permit (CUP). The Community Plan also includes a notation that private elementary school, junior high, and senior high school uses occur at this site; the project would not change the existing private school use at the site and thus would be consistent with the school notations for the property. Relative to the general issues addressed in the Community Plan, the School would continue to operate within the existing campus and the project would not physically divide or interfere with the surrounding residential community; thus, the existing land use relationships in the area as well as the overall character of the neighborhood would be preserved. The project would be generally consistent with the land use policies in the Community Plan and would specifically support those policies pertaining to schools, namely promoting compatibility in school locations, site layout and architectural design with adjacent land uses and community character and expanding an existing school rather than developing a new site. As such, the project would be consistent with the Community Plan.

The project site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside) by the City of Los Angeles Planning and Zoning Code. The proposed project would not exceed the development standards specified for this zone. Specifically, the floor area ratio of The Buckley School campus, at approximately 0.21:1, would be substantially less than the 3:1 permitted FAR. As indicated above, private schools are permitted within the RE-40 zone by CUP, through which design and/or operational conditions may be imposed and enforced by the City. The Buckley School currently operates pursuant to CUP No. 17967, which permits a maximum enrollment of 750 students. The proposed Campus Enhancement Plan would require a new CUP for The Buckley School in order to allow a maximum enrollment of 830 students by the 2014–2015 school year, plus up to eight additional faculty members and up to eight other additional staff to accommodate student enrollment. Additional changes in School operating conditions would be permitted under the provisions of the new CUP, as detailed in Section IV.H, Land Use. With approval of the proposed CUP, the project would comply with applicable zoning requirements.

In addition, the project proposes a modification of the height regulations pursuant to LAMC §12.24F to allow building heights up to a maximum of 55 feet. Two proposed buildings, the Middle and Upper School Main Academic Center (maximum 55-foot height) and the Academic Building West (maximum 39-foot height), would exceed the 36-foot maximum height limit pursuant to LAMC §12.21A 17(c).[9] However, the Main Academic Center would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project.[10] Similarly, the Academic Building West would visually appear no greater than 32 feet as measured from finished grade.

[9] *In addition, two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

[10] *A 55-foot maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import.*

All other proposed buildings would fall within the 36-foot height limit specified by the City's hillside requirements. In any case, nearly all of the new structures would have heights that are similar to existing building heights on-site. Furthermore, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[11] With the approval of the height modification pursuant to LAMC §12.24F, the project would be consistent with applicable height regulations of the LAMC.

The project would also require modification of the height regulations pursuant to LAMC §12.24F to allow landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre entrances in lieu of the maximum three and one-half feet otherwise permitted in the front yard and six feet otherwise permitted in the side yard in a hillside zone pursuant to LAMC §12.22C 20. With approval of this height modification, the project would also be consistent with applicable regulations of the LAMC.

The Mulholland Scenic Parkway Specific Plan (MSPSP) includes regulations for development and use of properties within the Outer Corridor; these regulations apply to project sites, such as the Buckley campus, when all or a portion of the lot to be developed is located within the Outer Corridor. With regard to land use, the project requests a Specific Plan Exception for relief from the MSPSP requirements in order to allow the continued educational/institutional use and new associated facilities subject to the Specific Plan. Approval of a Specific Plan Exception would allow the continuation of an existing legal non-conforming private school (institutional) use. The project would also be consistent with the environmental protection measures for Outer Corridor development, which address prominent ridges, streams, projects located near parklands, oak trees, and archaeological and paleontological resources. As part of the project, a Specific Plan Exception pursuant to LAMC §11.5.7F would also be required to allow one building to exceed the 40-foot height limit specified for the Outer Corridor. As discussed above, the Middle and Upper School Main Academic Center would require a 55-foot maximum building height due to proposed changes in finished grade that would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. However, the building would appear no greater than 43.6 feet in height from most vantage points. All other proposed building heights would fall below the 40-foot height limit specified by the Specific Plan. With the approval of Specific Plan Exception pursuant to LAMC §11.5.7F, the project would be consistent with applicable height regulations of the Specific Plan.

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[11] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

Project development would also be guided by the Specific Plan Design and Preservation Guidelines. The Guidelines are not intended to be mandatory requirements for projects; rather, it is expected that, at a minimum, individual projects address the applicable Guidelines. The project would be generally consistent with applicable guidelines, as detailed in Section IV.H, Land Use. Overall, the project would also comply with the intent of the Design and Preservation Guidelines, which seek to protect views along the Mulholland Scenic Parkway Corridor in accordance with the Specific Plan.

(2) Consistency with Regional Plans and Applicable Policies

The project would support the concepts and policies contained within the Southern California Association of Governments' Regional Comprehensive Plan and Guide, as expansion of the existing school facilities would concentrate development within a previously developed site located near existing public facilities, infrastructure, and roadways. Additionally, since the Southern California Air Quality Management District's Air Quality Management Plan (AQMP) incorporates projections from local planning documents and the proposed project would be consistent with the existing land use designations of the relevant Community Plan, the project would not conflict with the AQMP for the South Coast Air Basin. Furthermore, implementation of the project would not conflict with the Metropolitan Transport Authority Congestion Management Plan (CMP), as it would not exceed CMP thresholds at any CMP intersection or freeway monitoring location.

(3) Land Use Compatibility

The existing Buckley School campus has been developed for use as a private school since the late 1960s. Educational uses have therefore been part of the land use relationships within the local residential area for over a generation. Public school properties are, for the most part, located throughout the City of Los Angeles in residential neighborhoods, and are zoned "Public Facility" due to public ownership. Private schools, on the other hand, are typically permitted as a conditional use subject to issuance of a CUP in which conditions are specified to ensure compatibility with nearby residential uses. Thus, schools are a necessary and appropriate use in residential areas. Project consistency with the site's existing and proposed land use and zoning designations, discussed above, further supports the suitability of proposed development at the project site.

The project represents a continuation of an existing private school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. The proposed campus enhancements would support a well-established City policy that the improvement of existing school facilities, when properly conditioned through the discretionary review process, is preferred over the construction of entirely new school facilities within established residential areas. Furthermore, the project would allow the School to revise operating conditions that are confusing or stimulate difficulties with the neighbors to incorporate current City standards for private schools within the City.

Development of the project within the existing campus would not physically disrupt or divide existing land uses in the area, encroach upon residential uses, or alter the overall character of the campus or the surrounding neighborhood. While the project would allow for an increase in floor area, a modest increase in the number of students, and new outdoor athletic facilities (e.g., the proposed Aquatic Center and new basketball court), none of the operational characteristics of the project would result in a significant environmental impact. Construction of the project would result in significant impacts associated with noise and localized air emissions. However, these impacts would be short-term in nature and would be phased to avoid disruption of classes during the regular school year and to minimize impacts on neighbors of the campus at all times. Based on the above, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

b. Cumulative Impacts

The 29 related projects in the project vicinity generally consist of infill development and redevelopment of existing uses. As with the proposed project, related projects would be required to comply with relevant land use policies and regulations. Therefore, as the project would generally be consistent with applicable land use plans, the project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts on the regulatory framework would be less than significant.

Additionally, there are no related projects located within the immediate vicinity of the site. Therefore, the project in combination with related projects would not alter the existing land use relationships in the community. As such, the project would not contribute to a cumulative impact with respect to land use compatibility.

c. Mitigation Measures

The project’s design features, which are described in Section IV.H, Land Use, and would become conditions of approval, would ensure that land use impacts associated with the proposed project would be less than significant. Thus, no mitigation measures would be required.

d. Level of Significance After Mitigation

Impacts related to land use would be less than significant, and therefore, no mitigation measures would be required.

9. NOISE

a. Environmental Impacts

(1) Construction

The existing residential uses that surround the project site represent the noise-sensitive uses that would be most affected during project construction. Residential uses that are closest to the project site are located along Stansbury Avenue, Camino de la Cumbre and Camino de Solana. There are also sensitive receptors along other streets in the project vicinity including Beverly Ridge Drive and Coy Drive. As described in detail in Section IV.I, Noise of this EIR, since noise level increases would exceed the 5 A-weighted decibel (dBA) significance threshold at sensitive receptor locations during on-site construction activities, construction-period noise impacts would be significant without implementation of mitigation measures.

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the site throughout the construction duration. Based on the proposed truck routes and vehicle trips associated with construction workers, four roadway segments in the vicinity of the project site were analyzed for potential impacts associated with construction-related vehicular traffic. The largest construction traffic noise impact with respect to hourly L_{eq} (i.e., time variation in noise exposure expressed in terms of the average energy over time) is anticipated to occur along the segment of Stansbury Avenue, between the school gate and Valley Vista Boulevard, where construction-related traffic volumes would cause overall roadway noise to increase by 13.0 dBA L_{eq} (1-hour). With respect to increase in Community Noise Equivalent Level (CNEL), the largest noise increase would occur along the same segment of Stansbury Avenue where CNEL would increase by approximately 11.2 dBA. Noise levels would exceed the 5-dB significance criterion along each of the four analyzed roadway segments; therefore, construction-period roadway noise impacts are considered significant. It is important to note that this impact would result from a very high construction traffic volume scenario that could potentially occur during the peak day of the most intense stage of construction activity (i.e., the approximately three-month period of concrete truck traffic related to Phase 2 construction activities) where construction traffic comprises the highest percentage of total traffic volumes.

(2) Long-Term Operations Noise

Based on the project traffic study included as Appendix L to this EIR, the project is expected to generate an additional 329 daily trips due to increased enrollment and additional staff prior to traffic mitigation measures. Thus, traffic attributed to project improvements represents a nominal increase in traffic over the total daily traffic traveling along the local roadways. The largest project-related and cumulative traffic-related noise impact is anticipated to occur along the segment of Stansbury Avenue, south of Valley Vista Boulevard. Project-related traffic would add 0.5 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add an additional 0.2 dBA CNEL to this roadway segment. The largest cumulative traffic-related noise impact is anticipated to occur along two segments: Valley Vista Boulevard, east of Stansbury Avenue and Stansbury Avenue, north of Valley Vista Boulevard. The cumulative traffic-related noise impact to these roadway segments would be 1.1 dBA CNEL, which falls well below the 5 dBA CNEL significance threshold. Thus, roadway traffic noise related to project development would be less than significant and no mitigation measures would be required. Furthermore, with implementation of the TDM plan, with the ultimate goal to reduce project trips so there would be no increase in daily trips above that currently generated by the School, traffic noise would be further reduced.

An analysis was performed to determine the maximum allowable noise levels to be generated by rooftop equipment or the central plant without exceeding significance thresholds. Implementation of the proposed project design features, would ensure that rooftop equipment noise levels do not exceed 50 dBA during daytime operations, or 40 dBA during nighttime operations at any property line. Thus, when added to the presumed daytime and nighttime ambient noise levels of 50 dBA and 40 dBA, respectively, mechanical equipment generated noise levels would result in a maximum marginal noise level increase of 3 dBA to both the daytime and nighttime noise environments. This noise level increase would be below the 5 dBA significance threshold. As such, noise impacts related to mechanical equipment operations would be less than significant and no mitigation measures would be required.

The proposed project would include an enclosed parking facility located beneath the new Middle and Upper School Main Academic Center in the center of the project site. The parking facility would be enclosed and, therefore, off-site noise levels from existing parking activities may actually decrease due to noise attenuation from the structure. In addition, the vehicular entrance to the parking facility would be from the north with pedestrian access provided to the school to the west. As shown in the conceptual site plan, these openings would be internal to the site with existing and proposed buildings located further to the west. Thus, parking facility-related noise levels would not exceed the 5 dBA significance threshold at any residence located immediately north or west of the proposed parking facility. As a result, potential noise impacts that may result due to the parking facility would be less than significant and no mitigation measures would be required.

Project implementation would involve reconfiguring the outdoor athletic activity areas. Specifically, a new Aquatic Center would be built near the current outdoor basketball and weight facility located at the northeast corner of the athletic field. To provide for a conservative (high) estimate of potential noise impacts to nearby residences, the analysis assumed that all outdoor athletic activity areas would generate noise simultaneously. As described in Section IV.I, Noise of the EIR, the athletic field activities would increase noise levels in the vicinity of residential property locations by a maximum of 4.4 dBA L_{eq}, which is less than the City's 5-dB significance criterion.

b. Cumulative Impacts

Noise from construction of the proposed project and related projects would be localized, thereby potentially affecting areas immediately surrounding or between each particular project site. In addition to the 29 identified related projects, renovation and improvement of residential properties in the neighborhoods surrounding the school site is a regular occurrence and may last from less than a month to more than one year with highly variable noise implications. The nearest listed related project to the proposed project is a 16,500 square foot shopping center proposed at 14121 Ventura Boulevard, which is located about 0.5 mile north of the project site. Thus, due to distance attenuation alone, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the other project site. Furthermore, each of the related projects would be required to comply with the noise regulations set forth by the Los Angeles Municipal Code and subject to noise-limiting mitigation measures similar to those prescribed for the proposed project. As such, cumulative impacts associated with construction noise would be less than significant.

The cumulative increase in future CNEL traffic noise levels at project buildout with future ambient growth relative to the existing baseline would be 1.1 dB or less in areas that can potentially be affected by the proposed project. This increase would not be perceptible and would be less than significant.

The project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from lawn maintenance activities, mechanical equipment (e.g., air conditioning systems), and vehicle movements, among other community noise sources. As demonstrated above, noise impacts related to continued operation of the project site would be less than significant. In addition, the closest related project is located approximately within 0.5 miles to the north of the project site. As such, cumulative noise impacts related to long-term project operations would be less than significant.

c. Mitigation Measures

Mitigation Measure I-1: Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible.

Mitigation Measure I-2: All construction equipment shall be fitted with residential grade mufflers, where readily available in the construction equipment fleet that regularly serves the City of Los Angeles. Prospective contractors shall demonstrate a good faith effort to locate such construction equipment for use throughout the duration of project construction.

Mitigation Measure I-3: An 8-foot temporary sound barrier (e.g., wood fence) shall be erected along portions of the north and northwest property lines to limit the "line of sight" of construction activity from the adjacent residential properties that are located immediately north and northwest of proposed construction areas.

d. Level of Significance After Mitigation

Construction-period noise impacts after implementation of mitigation measures would be the highest at multiple residence locations situated along Camino de la Cumbre and Stansbury Avenue. At some residence locations along these two streets, the hourly L_{eq} could potentially increase by as much as 10 dBA over baseline ambient noise conditions. Other sensitive receptors, including those along Camino de Solana and Beverly Ridge Drive, would also experience noise levels that exceed City significance thresholds, where the daytime hourly L_{eq} noise level after implementation of mitigation measures could potentially increase by as much as 5 dBA. Noise impacts during construction would continue to exceed the 5 dBA significance criterion at multiple receptor locations during all project construction phases even with implementation of feasible mitigation measures. As such, construction-period noise impacts would be temporary, significant and unavoidable.

In addition, roadway noise attributable to construction traffic volumes will exceed the 5 dBA significance threshold along the following roadway segments during various portions of the construction period: Valley Vista Boulevard, west of Stansbury Avenue; Valley Vista Boulevard, east of Stansbury Avenue; Stansbury Avenue, between School Gate and Valley Vista Boulevard; and Stansbury Avenue, north of Valley Vista Boulevard. As there is no feasible mitigation to reduce these impacts, roadway noise impacts during construction would be temporary, significant and unavoidable.

As discussed above, no significant impacts associated with athletic field noise, long-term roadway noise, or mechanical equipment/stationary-source noise were identified. As such, noise impacts related to these elements of long-term project operations would be less than significant.

10. TRANSPORTATION AND CIRCULATION

a. Environmental Impacts

(1) Construction

Construction of the project would generate a range of approximately 84 to 416 daily trips, with an average of 176 daily trips, conservatively. The same amount of construction trips was assumed for both weekday and Saturday conditions. As discussed in detail in the Traffic Study presented in Appendix L, significant construction traffic impacts would occur only at the street segment of Stansbury Avenue south of Valley Vista Boulevard.

With regard to parking, all construction-related vehicles would be parked or stored in designated areas on-site to the extent possible. When sufficient space is not available to park all users on-site, the School would implement a parking plan that provides temporary off-site parking for construction workers and, if necessary, faculty/staff and/or students. A shuttle service would be operated between the off-site parking location and the project site at two possible locations approximately one mile from the project site. Under this parking plan, an adequate parking supply would be available to accommodate all construction- and School-related vehicles without the use of any on-street parking nearby. Therefore, no parking impacts due to construction-related activities are anticipated on the surrounding streets.

(2) Operation

The project would be expected to generate approximately 329 net new daily vehicle trips. During the A.M. peak-hour, a net increase of 75 trips (42 inbound and 33 outbound) would occur. During the school P.M. and commuter P.M. peak-hours, a net increase of 47 trips (22 inbound and 25 outbound) and 25 trips (9 inbound and 16 outbound) would occur, respectively. The project would significantly impact three intersections: (1) Ventura Boulevard and Stansbury Avenue during the A.M. and school P.M. peak hours; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard during the A.M. and school P.M. peak hours; and (3) Valley Vista Boulevard and Stansbury Avenue during the A.M. peak hour. Proposed mitigation measures would reduce these significant intersection impacts to less than significant levels.

With regard to impacts on residential street segments, the project would add approximately 293 net daily trips to Stansbury Avenue south of Valley Vista Boulevard and thus, would significantly impact this residential street segment. Proposed mitigation measures would reduce this residential street impact to a less than significant level. No other impacts to residential street segments are anticipated.

The project's proposed new configuration of circulation space would require all vehicles entering the Stansbury Avenue gate to proceed to the new arrival plaza, visitor parking area, or enter the enclosed parking facility. The new parking facility will provide a queuing capacity for approximately 51 vehicles on the lower level and approximately 18 vehicles on the upper level, for a total of 69 vehicles. The new arrival plaza would also serve to maximize the vehicle queuing capacity of the campus. Under the proposed project, the existing vehicle queuing on Stansbury Avenue would be eliminated. Thus, the project would improve on-site access and circulation, and impacts would be less than significant.

With regard to CMP intersection impacts, the intersections of Ventura Boulevard/ Woodman Avenue, located one mile northeast of the project site, and Ventura Boulevard/ Sepulveda Boulevard, located two miles northwest of the project site, are designated CMP monitoring intersections within the project vicinity. Based on the traffic study provided in Appendix L of this EIR, the proposed project would not add 50 or more trips to the two CMP intersections, and impacts would be less than significant.

The CMP also requires that any freeway segment where a project is expected to add 150 or more trips in any direction during the A.M. or P.M. peak hours be analyzed. The maximum number of trips to be generated for a peak hour would be 42 inbound trips during the A.M. peak hour. Therefore, as the peak-hour trips expected to use the freeway network for project site access are substantially less than the freeway threshold of 150 directional trips, impacts to the freeways would be less than significant. No further analysis of CMP freeway analysis is necessary.

As described in detail in Appendix L, the project's parking supply of 306 spaces, along with the supplemental off-site parking and shuttle service for special events (e.g., Buckley School Annual Fair, Commencement Proceedings) would be sufficient to meet parking demand. Thus, impacts on parking would be less than significant.

b. Cumulative Impacts

The traffic models utilized in the traffic analysis incorporated forecasted traffic increases due to ambient growth and related projects through the future study year (2014). Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, residential neighborhoods, and regional transportation system as a result of the proposed project have been analyzed. Impacts pertaining to site access/queuing are localized impacts. As there are no other related projects within the immediate project vicinity, the project would not contribute to cumulative impacts for these issue areas. With regard to parking and emergency access, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. Therefore, cumulative impacts related to these issues would be less than significant.

c. Mitigation Measures

Mitigation Measure J-4: Transportation Demand Management (TDM) – Implement an enhanced TDM Plan that improves carpooling and bus ridership for students and achieves at least a 40 percent reduction in project daily trips (75 trips in the A.M. peak hour). The ultimate goal of the TDM Plan would be to reduce project trips so there would be no increase in daily trips above that currently generated by the site. This will result in a trip ceiling of 702 trips in the A.M. peak hour. The TDM plan shall encourage the use of rideshare/carpool, public transportation and privately operated bus shuttle services. The final TDM Plan would be refined in consultation with LADOT. This plan shall be submitted to the DOT Development Review Section for approval at the beginning of each school year. (Refer to Appendix L of this EIR for a draft of the proposed TDM Plan).

Mitigation Measure J-5: Ventura Boulevard and Stansbury Avenue – Widen Stansbury Avenue by 10 feet along the east side of Stansbury Avenue between Ventura Boulevard and the alley south of Ventura Boulevard.[12] Restripe Stansbury Avenue to provide one exclusive left-turn lane and one exclusive right-turn-only lane in the northbound direction.

Mitigation Measure J-6: Valley Vista Boulevard and Stansbury Avenue – Stripe southbound Stansbury Avenue and eastbound Valley Vista Boulevard to each provide one left-turn/through shared lane and one right-turn-only lane in the

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12 *These transportation improvements shall be guaranteed through the B-permit process of the Bureau of Engineering, Department of Public works. Any improvements shall be constructed and completed before the issuance of the final certificate of occupancy, to the satisfaction of DOT and the Bureau of Engineering. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator to arrange a pre-design meeting to finalize the design for the required transportation improvements. Additional street improvements may be required. The applicant should contact the Bureau of Engineering, Department of Public Works to determine any other requirements. Any street dedication shall be completed through the Department of Public Works, Bureau of Engineering, Land Development Group, before the issuance of any building permit for this project.*

southbound and eastbound directions.[13] The removal of approximately three on-street parking spaces would be required along the west side of Stansbury Avenue north of the intersection, in addition to approximately one to two on-street parking spaces along the south side of Valley Vista Boulevard west of the intersection.

Mitigation Measure J-7: Stansbury Avenue – All student drop-off and loading shall take place entirely on-site, without any on-street student drop-off. The School shall prepare a student drop-off and pick-up plan to be reviewed by the LADOT district office. The plan shall include provisions for staggered drop-off and pick-up hours so as to reduce queuing on-site. The plan shall also include provisions for penalties for parents who do not follow the drop-off and pick-up rules. The plan shall also include a site plan of the school with the drop-off and pick-up areas clearly designated.

Mitigation Measure J-8: Compliance Report - The applicant shall be required to hire a licensed traffic engineer as a consultant to conduct traffic trip counts at the school and submit a Compliance Report to DOT during the fall of each year. The applicant shall be required to submit the fall Compliance Report before the end of November of each year. If the school exceeds its trips ceiling (i.e., 702 trips in the A.M. peak hour), the school shall conduct new counts and submit a spring Compliance Report before the end of April of each year. In the event that the applicant is not in compliance with the trip ceiling in the spring Compliance Report, the applicant shall be required to pay a $1,000 (one thousand dollars) penalty to the City of Los Angeles for each A.M. trip that the school generates in excess of its trip ceiling or reduce the student enrollment for the following school year an amount equal to the number of peak hour trips exceeded during the previous year. If the project trip generation proves to be in compliance with the established trip ceiling for five consecutive years the applicant shall no longer be required to submit the Compliance Reports to DOT.

Mitigation Measure J-9: Site Access and Circulation - All loading and unloading of students must be accomplished on-site. The reservoir space for dropping off or picking up students must be large enough so that vehicles do not encroach onto the City right-of-way. It needs to be substantially in conformance with the design submitted to DOT on August 4, 2006 as part of the On-Site Queuing Capacity Analysis.

[13] *This mitigation measure, which was required by LADOT in its traffic assessment letter (included as Appendix L-1), reflects a slight variation from the mitigation measure for this intersection recommended in the traffic study, but mitigates significant impacts at the intersection to a less than significant level to generally the same degree.*

Mitigation Measure J-10: Site Access and Circulation - Final DOT approval shall be obtained regarding the project's driveways, internal circulation and parking schemes prior to issuance of any building permits. This should be accomplished by submitting detailed site and driveway plans, with a minimum scale of 1"-40', to DOT's Valley Development Review Section.

d. Level of Significance After Mitigation

With implementation of the mitigation measures J-4 through J-10 above, the significant operational traffic impacts at the three intersections and residential street segment would be reduced to less than significant levels.

Temporary construction-related traffic impacts would remain significant even after the implementation of mitigation measures. There are no feasible mitigation measures which could reduce construction-traffic impacts to levels that are less than significant. The only reasonable alternative mitigation would be to extend the construction time frame so that there would be less construction personnel and vehicles on-site at any give time. However, such a measure would be inefficient as well as costly and would prolong disruption to School operations and the surrounding neighborhood. Nevertheless, the mitigation measures above would help to minimize construction impacts to the extent possible.

II. PROJECT DESCRIPTION

A. INTRODUCTION

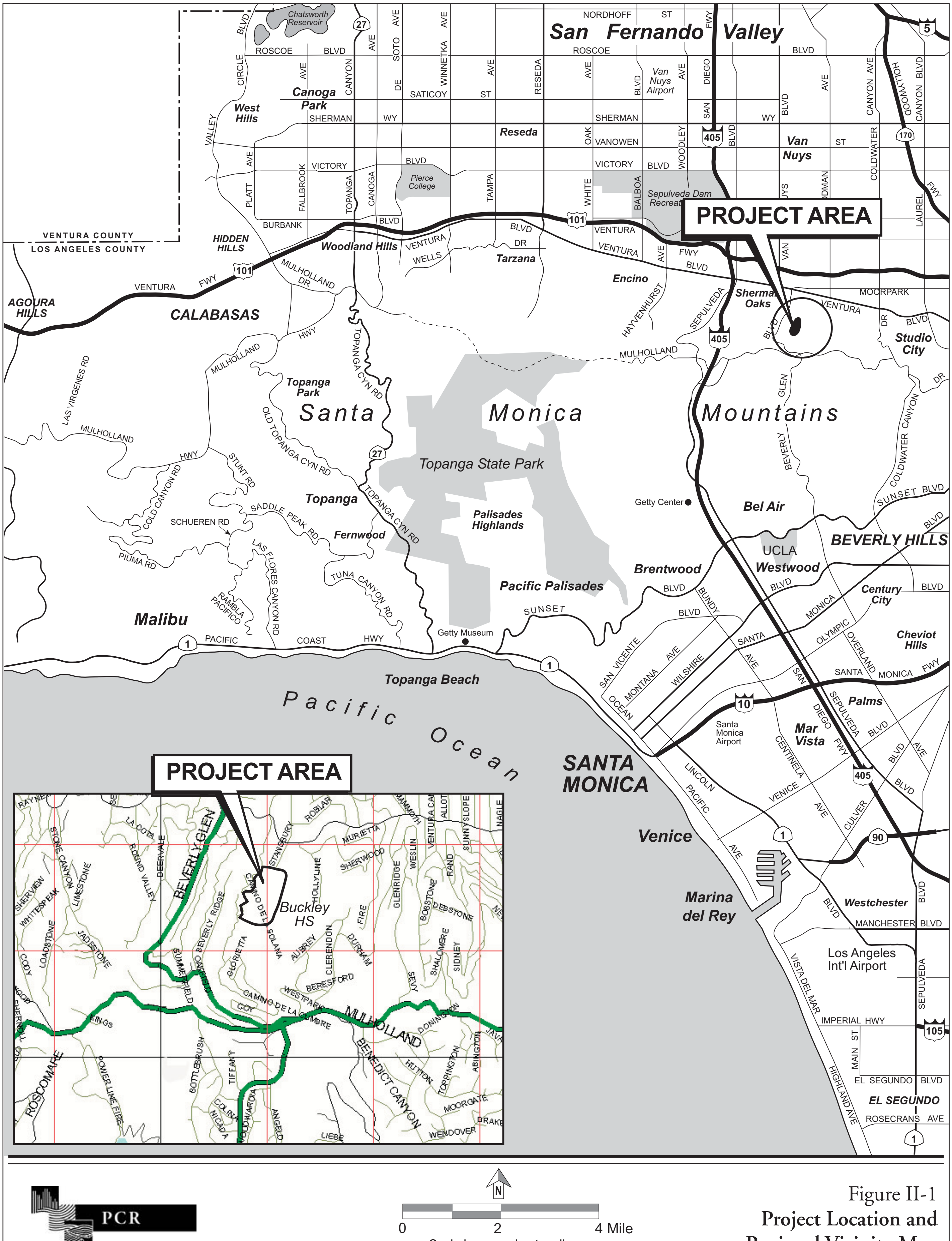
The Buckley School (the School), the project Applicant, proposes to enhance its existing campus facilities located at 3900 Stansbury Avenue in the Sherman Oaks Community of the City of Los Angeles. The improvements are proposed as part of the Campus Enhancement Plan (referred to herein as the project or the proposed project), the intent of which is to address the needs of existing and future school programs, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades. Included within the Campus Enhancement Plan are vehicular circulation and queuing improvements, increased parking within a new enclosed parking facility, the demolition of six buildings, construction of five new/replacement buildings, a central plant, and addition to and/or renovation of several existing buildings. Upon completion, a net addition of approximately 69,500 square feet of building area would be provided, resulting in a total of 168,650 square feet of educational facilities within the project site.[14]

The project described herein reflects revisions to the previous plan described in the November 2004 EAF/Draft Initial Study and the Notice of Preparation (NOP) dated January 12, 2005, in response to concerns expressed by certain members of the surrounding residential community, particularly regarding construction impacts and soil export. A revised NOP reflecting the project analyzed herein was issued in February 2006.

B. PROJECT LOCATION AND SURROUNDING USES

The project site is located at 3900 Stansbury Avenue in the Sherman Oaks community of the City of Los Angeles. As indicated by Figure II-1 on page 45, The Buckley School campus is approximately 13 miles northwest of downtown Los Angeles and 12 miles northeast of the Pacific Ocean. The campus is located at the terminus of Stansbury Avenue and immediately to the east of Camino de la Cumbre. The San Diego Freeway (US-405) is located approximately two miles to the west of the project site and the Ventura Freeway (US-101) is located approximately one mile to the north of the project site. Other primary roadways in the vicinity of

[14] *These building area square footage calculations refer to floor area ratio (FAR) program space and do not include areas such as exterior covered walkways, exterior covered balconies and roof overhangs. These exterior areas, as well as mechanical rooms, are not included in the Los Angeles Planning Code definition of floor area (LAMC §12.03), but may be included in the Los Angeles Building Code definition of floor area.*



Source: PCR Services Corporation, 2006

PCR

Figure II-1
Project Location and Regional Vicinity Map

the site include Ventura Boulevard to the north, Mulholland Drive to the south, Beverly Glen Boulevard to the west and Coldwater Canyon Avenue to the east.

The project site is located within a canyon setting on the north side of the Santa Monica Mountains. The project site is surrounded on the north and west by residential uses, and to the east and south by land owned by the Santa Monica Mountains Conservancy (SMMC). Additional residential uses are located to the east and south of this land. The aerial photo provided in Figure II-2 on page 47 shows the existing project site and surrounding uses.

C. SITE BACKGROUND AND EXISTING CONDITIONS

The Buckley School was founded by Dr. Isabelle Buckley in 1933. After purchasing land formerly occupied by the Glen-Aire Country Club, the school was moved to its current location in the late 1960s. With campus buildings constructed through the late 1970s, The Buckley School includes approximately 99,150 square feet of building area and 214 surface parking spaces within the existing approximately 18.3-acre campus. The Buckley School also owns approximately 12.6 acres of vacant, non-adjacent land to the south of the campus. Due to its canyon location on the northern side of the Santa Monica Mountains, the topography of the site varies from approximately 750 feet above mean sea level (asl) within the northern part of the project site to more than 900 feet (asl) within the southern portion of the project site. Primary access to the site is provided via Stansbury Avenue to the north. In addition, within the western portion of the site, a driveway provides limited access via Camino de la Cumbre.

The Buckley School enrolls approximately 750 students within Kindergarten through Grade 12 (enrollment for the 2005-2006 school year was 746 as of December 2005, with permitted capacity for an additional four students). These grade levels are organized into three broader programs: the Lower School (Kindergarten through Grade 5); the Middle School (Grades 6 through 8); and the Upper School (Grades 9 through 12). Currently, there are 109 full-time and 8 part-time faculty members and 43 full-time and 2 part-time staff employed on-site. Regular classroom hours are staggered for each of the Lower, Middle and Upper Schools. Collectively, the classroom hours begin at 8:00 A.M. and end at 3:15 P.M., Monday through Thursday. Friday classroom hours are shorter and end by 2:20 P.M. Extra-curricular activities, including athletic practices and competitions, fine art and performing arts events, student clubs and organizations, and family activities, extend until 10 P.M., with some special events extending until 11 P.M. In addition, the school hosts other school-related events occasionally on the weekends.

As shown in Figure II-3 on page 48, the Lower School is located within the northern portion of the campus and includes several buildings on the west side of the site that comprise approximately 26,500 square feet of building area and provide 20 classrooms. The Middle and Upper Schools utilize several buildings located on the east side of the site. These buildings

Scale not Provided

Source: PCR Services Corporation, 2006

Figure II-2
Aerial Photograph

PCR

Scale not Provided

Source: Jeffrey M. Kalban & Associates Architecture, Inc. 2006

Figure II-3
Existing Site Plan

include 37 classrooms comprising approximately 32,000 square feet of floor area, the Disney Pavilion (29,000 square feet), which includes a swimming pool and gymnasium, and other accessory areas. The remainder of the campus structures comprise 11,650 square feet of building area and include an athletic field house, guard house, maintenance building, and several temporary storage buildings. The academic and associated buildings that comprise the core of the Lower, Middle, and Upper Schools are located on what is referred to herein as the Main Academic Campus, which is differentiated from uses and structures located at a higher elevation within the athletic field area, referred to as Gilley Field. Overall, existing buildings on-site include approximately 99,150 square feet of building area and provide 60 classrooms.[15] The existing campus buildings are one to two stories in height (approximately 13 to 38 feet high) and include stucco exteriors and clay tile roofs, generally suggesting a Southern California vernacular architecture. In addition, an athletic field with an associated concrete grandstand, an outdoor basketball court, and various play areas are located within the campus. A pole-mounted, backlit, changeable sign is located near the campus exit. Table II-1 on page 50 summarizes the existing facilities on the project site.

The Buckley School campus presently has a total of 214 on-site parking spaces, located primarily in a surface parking lot within the northern portion of the campus as well as other smaller surface lots scattered throughout the campus. The School contracts with a private bus service to provide a student busing program, with 116 students enrolled during the 2005–2006 school year. Additionally, approximately 398 students participate in the school's carpooling program.[16] To supplement existing parking, the School leases an additional 100 parking spaces at the Sherman Oaks Fashion Square parking lot, located approximately one mile north of campus. This lot is used for student parking, with shuttle service to/from the campus.

The project site is zoned RE-40-1-H (Residential Estate, Height District 1, Hillside) pursuant to the City of Los Angeles Zoning Code. The Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan designates the site for Minimum Density Residential and Very Low Residential uses. The Community Plan also includes a notation identifying elementary, junior high and senior high school uses within the project site. The existing school uses are permitted and operated on the site pursuant to an existing approved Conditional Use Permit (CUP). Approximately 3.28 acres of the southern portion of the campus, currently used as sports fields with a grandstand, field house, and various small storage buildings, lie within the Mulholland Scenic Parkway Specific Plan area. Specifically, this southern portion of the site is located within the "Outer Corridor," as defined by the Mulholland Scenic Parkway Specific Plan.

[15] *The classroom count includes one room each within the Transportation Building and the Field House that are used as temporary classrooms to compensate for the existing shortfall in classroom space.*

[16] *Refer to the Traffic Impact Study prepared by Crain and Associates, provided in Appendix L of this EIR, for further discussion of the busing program, carpools, and other transportation programs at the school.*

Table II-1

Facilities on the Existing Campus

On-Site Structures	Building Area (sq.ft.)
Academic and Athletic Facilities	
Lower School Arts Building	1,100
Assembly Room Building	6,250
K–1 Classroom Building	4,350
Lower School Buildings	5,550
Upper School Buildings	9,250
Robert Young Library	5,000
Administration Building	9,500
Middle School Humanities	4,000
Upper School Humanities	7,000
Disney Pavilion	29,000
Academic Building South	6,500
Field House (with 1 accessory structure)	2,000
Subtotal	*89,500*
Support Facilities	
Guard House	150
Milk House (5 structures)	700
Transportation Building	3,500
Maintenance Building (10 structures)	2,800
Outdoor Playcourt Storage Building (5 structures)	2,500
Subtotal	*9,650*
Total	**99,150**
Other Facilities	**Size**
Bell Tower	N/A
Miscellaneous Covered Walkways	N/A
Field Grandstand	N/A
Parking	**Spaces**
Existing Campus Parking	214 spaces

Source: The Buckley School, 2006.

Many of the school's existing facilities are aging and inadequate. From a regulatory perspective, various campus buildings require improvements to meet current Americans with Disabilities Act (ADA) regulations, Fire Code requirements, and California Energy Code standards. In general, many of the existing buildings and classrooms are functionally outdated and inefficient. For example, there are six classrooms with no windows, some classrooms that aren't connected to the school's indoor public address system, and few spare classrooms available during the school day for faculty-student meetings, student work groups, and faculty gatherings. Storage space on-site is inadequate, and the kindergarten lunch area is sub-standard.

Additionally, standards for modern classroom sizes have changed since construction of the existing campus in the late 1960s due to the additional space needed for computers and other interactive instructional areas. Several classrooms are too small to accommodate computers, and the computer labs can only accommodate a maximum of 12 students at a time with no additional computers or instructional space for teacher use. The science, fine arts, and performing arts instructional spaces within the site are also smaller than is standard for a modern coeducational college preparatory school. For example, the Middle/Upper School dance room has low ceilings that do not allow for jumping or leaping, and the Lower School music and dance classes share an assembly area as a classroom. The science laboratories are also outdated, and some rooms used for science courses lack lab/wet facilities. A number of school programs do not currently have adequate instructional space, and consequently some classes are held within the lobby of the Disney Pavilion and within the Transportation Building. The lack of classrooms requires that two courses occasionally be conducted simultaneously within the same room. Furthermore, the number of students that can be accommodated in some courses is limited by the physical size of each classroom, rather than being dictated by the educational needs of the student population. In addition, college preparatory curriculum has changed over time, requiring advanced, honors, and college advanced placement sections, which occur at the same time as regular classes, for most science and humanities courses. As a result, more classrooms are needed to provide for these additional sections.

Since the original construction of The Buckley School, after school athletic program requirements also have changed substantially with the passage of Title IX of the U.S. Code, which requires schools to offer equal and sufficient athletic opportunities to both girls and boys. This policy together with Buckley's "no cut" policy for Middle School athletic teams has created the need for additional athletic facilities space, including indoor practice spaces that can be utilized daily without the need to split or share space with performing arts courses, an additional basketball court for athletic classes and practices, and associated storage space. Currently there is an insufficient number of athletic facilities, precluding the ability to hold simultaneous practice sessions for all in-season sports.

An important issue to The Buckley School and the surrounding residential community is traffic congestion during morning student drop-off and afternoon student pick-up periods. The existing parking lot does not have sufficient capacity to accommodate both bus and vehicle queuing and parking on campus, thus resulting in spillover queuing on Stansbury Avenue.

The Buckley School Campus Enhancement Plan described herein has evolved from a planning and design process dating back to 1997 that has included extensive community input. The project has undergone numerous revisions over the years and the School has continued to work with the community to address their concerns while accommodating the School's educational needs. The Buckley School filed an application in 1997 for a new CUP for the Campus Master Plan that would have increased student enrollment to 975 students. Processing of the plan was suspended in 1999, and it was withdrawn in 2001. In 2003, prior to submitting any formal applications to the City, The Buckley School presented a preliminary conceptual plan for new facilities to various community members. In response to community comments, The Buckley School made further refinements to its proposal. In August 2004, The Buckley School provided a revised proposal to the surrounding community. Subsequently, an Environmental Assessment Form was filed with the City of Los Angeles for the proposed project, which reflected further refinements made to that revised proposal. In accordance with the California Environmental Quality Act (CEQA), an Initial Study was then prepared for the project and an NOP requesting comments to be considered in a Draft Environmental Impact Report (EIR) was circulated from January 12, 2005, through February 11, 2005. A public Scoping Meeting to receive comments on the project was held on January 25, 2005. Comments received during the 2005 NOP circulation period and at the Scoping Meeting are included in Appendix A of this EIR.

Most recently, in response to the plan described in the November 2004 EAF/Draft Initial Study and the NOP dated January 12, 2005, some members of the community expressed concerns particularly regarding construction impacts and soil export. In an effort to address such comments and reduce associated environmental impacts, the project has been revised as discussed below. A new Initial Study was prepared for the project and an NOP requesting comments to be considered in a Draft EIR was circulated from February 10, 2006, through March 13, 2006. Comments received during this most recent NOP circulation period are included in Appendix B of this EIR.

D. STATEMENT OF PROJECT OBJECTIVES

Section 15124(b) of the CEQA Guidelines states that the Project Description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the proposed project is to address the needs of existing and future programs offered within the campus, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, multipurpose spaces for educational gatherings that cannot occur in a standard classroom, vehicular circulation and queuing improvements, and increased parking on-site. The project also provides for the modernization of existing facilities, improved disabled access, and energy efficiency upgrades with the introduction of a Central Plant.

As set forth by the CEQA Guidelines, the list of objectives that the Applicant seeks to achieve for the project is provided below. As noted below, several of the project objectives support many of the goals, objectives, and policies set forth in the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan and the Mulholland Scenic Parkway Specific Plan, which guide land use in the project area. The objectives of the project are stated below under the following categories: Educational Objectives, Site Design and Community Objectives, and Community Plan and Specific Plan Objectives.

Educational Objectives

- Modernize and reconfigure instructional spaces and athletic facilities built in the mid-1960s to incorporate current technologies in the classroom, address the needs of the twenty-first century Buckley student, foster academic excellence, and maintain on-site athletic programs;

- Maintain K through 12 educational facilities in a unified campus at its present location to support academic synergies and attain efficiencies in meeting educational objectives;

- Create separate dedicated facilities for the athletic, visual arts, and performing arts programs that reflect the needs of the twenty-first century Buckley student and eliminate existing scheduling conflicts among some of the visual arts classes and between athletic programs and performing arts classes.

- Create science facilities as well as additional classrooms that reflect the needs of the twenty-first century Buckley student;

- Create state-of-the-art library and technology facilities that meet modern educational needs and enhance the Buckley educational experience;

- Provide appropriate instructional space for school programs in order to eliminate inadequacies in the existing educational facilities located on campus (e.g., the choir, which currently practices in the Disney Pavilion lobby; the athletic and performing arts courses that are forced to share classroom space and conduct classes simultaneously; classrooms that lack space for computers and other modern interactive instructional materials; and classes currently conducted in the Transportation Building);

- Accommodate a modest increase in total student enrollment to support Buckley's educational philosophy, enhance curriculum flexibility, and promote high academic standards encompassing a broad curriculum; and

- Introduce an Aquatic Center with an outdoor competition swimming pool in order to consolidate the swimming program and associated uses and optimize the use of indoor space within the Disney Pavilion.

Site Design and Community Objectives

- Design a project that nearly balances cut and fill quantities on-site in order to limit the export and import of soil and avoid associated impacts, such that only nominal export or import may be needed;
- Respect the residential character of the surrounding neighborhood;
- Provide facilities that meet modern fire protection, disabled access, and energy efficiency standards;
- Create on-campus parking spaces that sufficiently accommodate the vehicles operated by students, parents, and visitors that travel to the campus on a regular daily basis;
- Contain vehicle queuing and student drop-off/pick-up within the campus, keeping this activity off of Stansbury Avenue;
- Unify the campus and eliminate operational and safety challenges by eliminating regular access (except for emergency vehicles) along an internal roadway that currently bisects the campus;
- Provide an open air waiting area for students at the same grade as the pick-up/drop-off area within the Parking Facility so as to maximize student safety and the efficiency of the pick-up/drop-off process;
- Phase construction to limit disruption of classes during the regular school year and minimize impacts on neighbors of the campus at all times;
- Revise operating conditions that are confusing or stimulate difficulties between Buckley and its neighbors to incorporate current City standards for schools within the City;
- Focus the siting of new structures within the existing building footprints and utilize existing disturbed and paved areas in order to limit grading and excavation, minimize associated impacts, and retain landscaped and open space areas on-site;
- Concentrate construction within the center of the campus in an effort to buffer adjacent residential neighbors from construction activities and school operations;
- Design structures to complement the existing natural topography and minimize impacts to the surrounding hillsides;

- Design structures to be compatible with existing buildings by limiting the roof lines of new buildings within the Main Academic Campus to be even with or below the roof line of the existing Disney Pavilion;

- Create a visually unified campus and harmonize structures and landscaping with the natural landforms that surround the campus;

- Reduce hardscape and roadways in favor of a landscaped campus featuring native plant species appropriate for the canyon setting; and

- Upgrade mechanical facilities and improve energy efficiency throughout the campus by centralizing mechanical infrastructure within a Central Plant.

Community Plan and Specific Plan Objectives

- Provide adequately sized educational facilities to serve the needs of the existing and future population, recognizing that the expansion of existing schools is considered preferable to the acquisition of new school sites in the City (Community Plan Goal 6 and Objective 6-1.5);

- Incorporate measures into the project that minimize the impact of noise associated with construction and operation of the school on the surrounding residential neighborhood (Community Plan Objective 6-1.4);

- Promote land use compatibility with surrounding uses (Specific Plan objective);

- Ensure that all proposed improvements can be supported by existing and proposed public services and facilities, including water and wastewater facilities, storm drains, fire and police protection services, and roadways (Community Plan Policies 1-5.1 and 1-5.2);

- Emphasize a campus layout, building scale, and architectural design that improves the functionality of the campus, is compatible with the character of the surrounding community, and complements the existing structures on-site (Community Plan Policies 1-5.4, 6-1.1, and 6-1.3);

- Preserve and enhance the scenic resources and features found on-site (Specific Plan objective);

- Preserve, complement and enhance views of and across the campus from surrounding hillsides and specifically from Mulholland Drive through sensitive site planning and building design (Community Plan Policy 1-3.3 and Specific Plan objective); and

- Minimize grading and assure graded slopes have a natural appearance compatible with that of the Santa Monica Mountains (Specific Plan objective).

E. PROJECT CHARACTERISTICS

The project Applicant, The Buckley School, proposes to enhance its existing campus through implementation of the Campus Enhancement Plan. The Campus Enhancement Plan addresses the needs of existing and future programs offered within the campus, including the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational purposes that cannot occur in a standard classroom. Included within the Campus Enhancement Plan are vehicular circulation and queuing improvements, increased parking within a new enclosed parking facility, the demolition of six buildings, the construction of five new/replacement buildings, and addition to and/or renovation of several existing buildings.[17] Additionally, pedestrian and vehicular access improvements would separate students, faculty and staff from vehicles while still allowing for emergency access and would create a pedestrian-oriented campus with an identifiable center and an overall emphasis on landscape. More specifically, the project's proposed facilities would include expanded classrooms, specialized science facilities, performing and visual arts facilities, a new library, a multi-purpose room with retractable seating, a new food preparation/servery area, additional athletic spaces, departmental and administrative offices, storage facilities, and other support facilities. Additionally, an arrival plaza would be developed in conjunction with the proposed parking facility to provide sufficient on-site queuing for student pick-up/drop-off.

To fulfill the project's objectives, the project would be developed in three phases, each designed and timed to facilitate continued school operations on-site with the sequencing and relocation of classes during construction and to minimize disruptions to neighbors. The proposed phases are organized as follows:

- Phase 1: New Library and Technology Center

- Phase 2: New Middle and Upper School Main Academic Center and Parking Facility, replacement Guard House, new Central Plant, and new basketball court

- Phase 3: New Academic Building West, addition to and renovation of the existing Academic Building South, new Aquatic Center, Disney Pavilion renovation, and Lower School renovation

[17] *In addition, a Central Plant would be constructed, necessitating changes to the rooftop equipment of the existing buildings that would remain on-site.*

When accounting for approximately 26,350 square feet of building area to be removed, development of these project components would result in a net increase of approximately 69,500 square feet of building area over the existing 99,150 square feet of building area on-site, resulting in a total building area of approximately 168,650 square feet upon completion. Refer to Table II-2 on page 58 for a breakdown of the approximate building areas to be added to the campus by phase. The additional educational space would allow The Buckley School to better serve its existing student population and to accommodate a modest increase in its enrollment without significant expansion of the campus from its existing building footprint. Following project completion, a total of 85 classrooms would be provided on-site, for an increase of 25 classrooms over existing conditions.

As shown in Figure II-4 on page 59, the new structures would be located within the already developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon and the natural vegetation. As discussed further below, the proposed structures would measure between 18 and 55 feet in height from existing grade based on the Los Angeles Municipal Code (LAMC) definition of building height, but would visually appear no greater than 43.6 feet in height from most vantage points due to the sloping nature of the site's topography and grade changes proposed as part of the project.[18] A building height of up to 55 feet and the proposed changes in finished grade for the new Middle and Upper School Main Academic Center and Parking Facility would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. In any event, all of the new structures would have heights that are generally similar to existing building heights on-site, and no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[19,20] Each of the project's three phases and associated components is described in more detail below.

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[18] *Per LAMC §12.03, building height is defined as "the vertical distance above grade measured to the highest point of the roof, structure, or the parapet wall, whichever is highest. Retaining walls shall not be used for the purpose of raising the effective elevation of the finished grade for purposes of measuring the height of a building or structure." Also per LAMC §12.03, grade or adjacent ground level is defined as "the lowest point of elevation of the finished surface of the ground, paving or sidewalk within the area between the building and the property line, or when the property line is more than 5 feet from the building, between the building and a line 5 feet from the building." The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

[19] *It is noted that two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c); however, such buildings comply with the 40-foot height limitation set forth by the Mulholland Specific Plan Section 6D.*

[20] *Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

Table II-2

Proposed Facilities

Project Phases and Building Components		New Building Area (approx. square feet) [a]
Phase 1	New Library and Technology Center	18,770
Phase 2	New Middle and Upper School Main Academic Center and Enclosed Parking Facility, Replacement Guard House, New Central Plant, and New Basketball Court	61,570
Phase 3	New Academic Building West, Addition to and Renovation of the Existing Academic Building South, New Aquatic Center, Disney Pavilion Renovation, and Lower School Renovation	15,510
Total New Building Area for All Phases		**95,850**
Total Building Area to be Removed		**- 26,350**
Net Area Increase in Building Area		**69,500**
Total Existing Building Area		**+ 99,150**
Total Building Area Upon Completion		**168,650**
Parking		**Spaces**
Enclosed Parking Facility		240
Various Remaining Surface Parking Spaces throughout Campus		66
Total Number of Parking Spaces on Campus		**306**

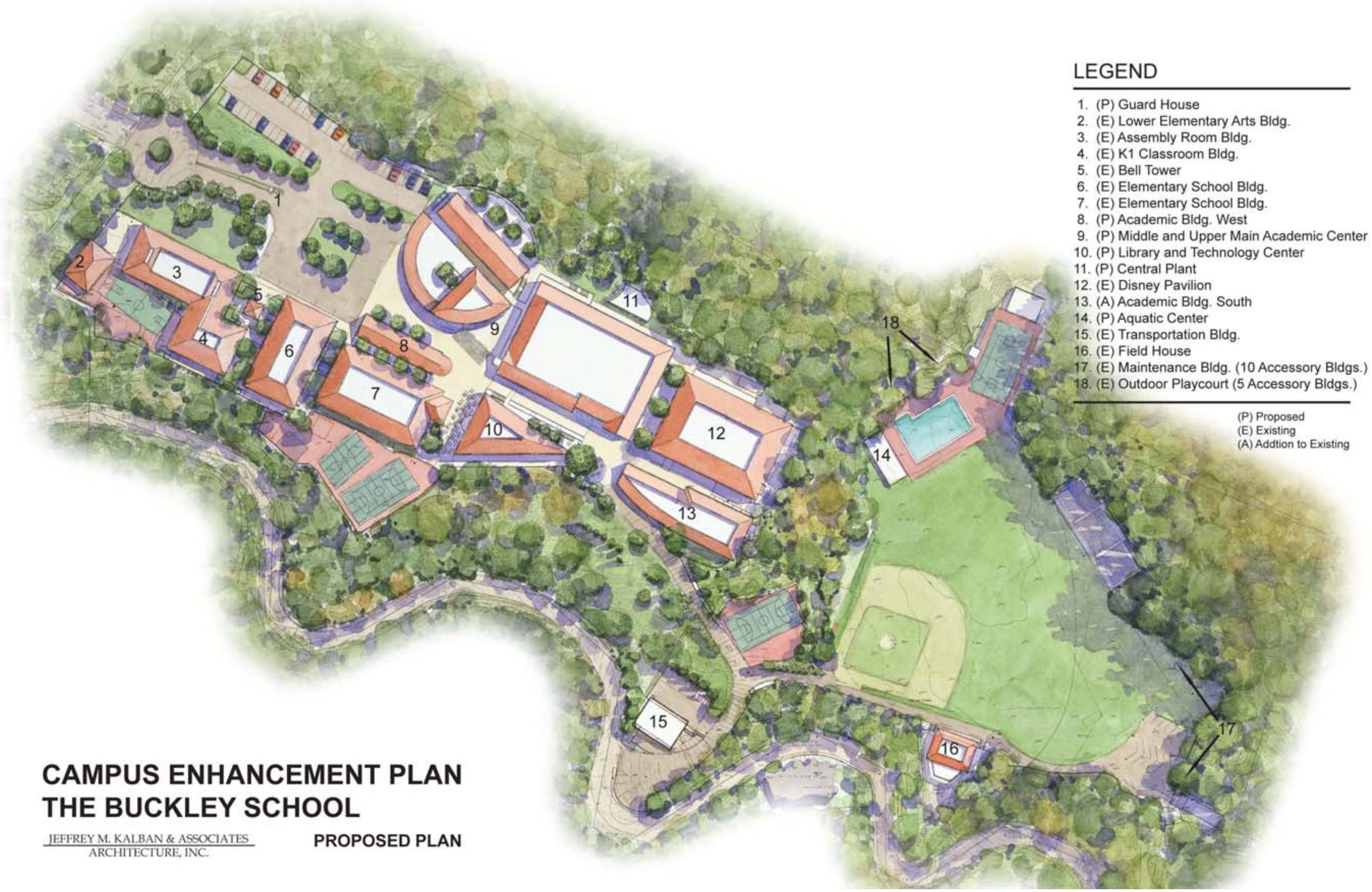
[a] *These building area square footage calculations refer to floor area ratio (FAR) program space and do not include areas such as exterior covered walkways, exterior covered balconies, roof overhangs, and mechanical areas. Such exterior areas, as well as mechanical rooms, are not included in the Los Angeles Planning Code definition of floor area (per LAMC §12.03), but may be included in the Building Code definition of floor area.*

1. Description of the Development Phases

a. Phase 1: New Library and Technology Center

Phase 1 would include construction of the new Library and Technology Center Building, which would include uses such as a library, a food preparation/servery area, administrative space, approximately two classrooms, and storage space. In addition, a business office currently located off-site would likely be relocated to this building.[21] As shown in Figure II-4, the new Library and Technology Center would be located on the west side of the campus along the proposed central pedestrian walkway/emergency access. This new building would be

[21] *Relocation of the existing off-site business office could occur during a later phase, following expiration of the lease for the off-site office space.*



Source: Jeffrey M. Kalban & Associates Architecture, Inc. 2006

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Figure II-4
Conceptual Site Plan

approximately 18,770 square feet in area, with two aboveground stories and a basement level. The existing 700-square-foot Milk House (comprised of five small outbuildings) and associated outdoor seating area would be removed to provide space for the new building. With development at the Milk House site, construction would occur within an existing developed area of the campus and limited excavation would be required for the basement. The excavated soil materials associated with construction of the Library and Technology Center would be spread out on the athletic field to avoid the need for soil export.[22] The topographic location of this site would also serve to screen the building from homes above the campus on Camino de la Cumbre. The building would be approximately 36 feet in height.[23]

Phase 1 would require approximately 12 months for construction. The Buckley School proposes the Library and Technology Center Building as the first new building to be developed so that it can be used for flexible classroom and administrative space during the construction of Phase 2 (discussed below).

b. Phase 2: New Middle and Upper School Main Academic Center and Parking Facility, replacement Guard House, new Central Plant, and new basketball court

Phase 2 would include a new Middle and Upper School Main Academic Center and Parking Facility, a replacement Guard House, new Central Plant, and a new basketball court. As shown in Figure II-4, the new Middle and Upper School Main Academic Center would be located on the east side of the campus, to the south of the proposed arrival plaza and east of the existing central driveway/fire road which would become a central pedestrian walkway/fire road for emergency access. The new Middle and Upper School Main Academic Center would be located on the site of, and would functionally replace, the existing Middle and Upper School Humanities Buildings. The new building would be approximately 61,420 square feet in area and would consist of two stories, except for a single-story component in the northwestern portion of the building. The Main Academic Center could potentially consist of a group of visually distinct classroom components that utilize the new enclosed Parking Facility as a common structural platform. Five existing buildings, including the Administration Building, Robert Young Library, Middle and Upper School Humanities Buildings, and Guard House, totaling approximately 25,650 square feet would be removed during Phase 2 to provide the necessary space for construction of the new buildings. The proposed classroom building would provide uses such as

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[22] *The use of Phase 1 soil materials as fill would raise the level of the athletic field by approximately 10 inches.*

[23] *The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

traditional classroom spaces; new specialized spaces for visual art, science, and performing arts instruction, as well as performing arts practice rooms; other support facilities; and a multipurpose room with retractable seating for up to approximately 392 people. A total of 43 classrooms would be provided, effectively replacing and supplementing 26 classrooms to be removed.

In addition to structural articulation to reduce building massing, the Middle and Upper School Main Academic Center would be designed with varied rooflines to reduce building heights viewed from the north and west. Much of the most visible façades of the building (i.e., the northern and western sides) would have low- to mid-rise rooflines measuring approximately 31.1 to 43.6 feet above finished grade, with building height increasing to the east. The tallest portion of the Middle and Upper School Main Academic Center would occur on the eastern façade, which would not be visible to neighboring residential properties. Based on the LAMC definition of building height (i.e., relative to existing grade), the building would have a formal maximum height of up to approximately 55 feet. However, given the sloping nature of the site's natural topography as well as grade changes proposed in this area of the campus, the building would visually appear as 31.1 to 43.6 feet in height from most vantages. Additionally, the proposed roofline would not exceed that of the existing Disney Pavilion to the immediate south.

As part of the Middle and Upper School Main Academic Center, an enclosed Parking Facility would be built below the classroom levels to accommodate on-site parking demand and additional vehicular queuing space. The Parking Facility would function as a structural foundation for the classroom levels above. The new Parking Facility would include two levels of parking to replace the existing 214-space main surface parking lot within the northern portion of the campus (a small portion of the northern lot would be retained for visitor parking and would be functionally integrated with the proposed arrival plaza). The Parking Facility would provide approximately 240 parking spaces including standard, compact and disabled-access spaces, with 127 spaces on the lower level and 113 spaces on the upper level. There would also be approximately 66 surface parking spaces remaining throughout the campus for use by guests, maintenance and service vehicles, and for disabled access. This would bring the total parking supply on-site to approximately 306 spaces. In order to minimize the amount of excavation and associated soil export and import required for the project, the lower parking level of the building would be constructed at roughly current grade (approximately 776 feet (asl)), with the upper parking level and Middle and Upper School Main Academic Center above it. The areas immediately east of the parking levels would be filled in with soil materials graded or excavated on-site. The remaining soils would be used to raise the campus driveway and arrival plaza. By raising the finished grade in this area of the campus, the project's excavated soils would be accommodated on-site, thereby nearly eliminating the need for soil export/import and associated truck trips.

The proposed Parking Facility would also increase capacity for vehicle queuing on campus during student drop-off and pick-up periods, thus eliminating the typical queuing of vehicles on Stansbury Avenue. All vehicular queuing would be entirely accommodated on the campus, with space for up to 69 vehicles to queue on the upper and lower levels of the Parking Facility, in addition to bus queuing as needed within the circular arrival plaza. Parking attendants and security personnel would continue to direct traffic flow and the student drop-off/pick-up process at the arrival plaza. Landscaped islands would be provided within the arrival plaza and the campus entry drive would be heavily landscaped, thereby visually improving the views onto campus from Stansbury Avenue.

In addition, demolition of the existing Guard House and construction of a replacement 150-square-foot Guard House located along the entry drive near the main campus entrance would occur during this phase. The new Guard House would be approximately 18 feet in height. The existing pole-mounted, changeable message sign located near the campus exit would be removed.

Phase 2 would also include construction of a Central Plant, to be located immediately east of the Middle and Upper School Main Academic Center at the foot of the adjacent slope.[24] The Central Plant would house a cooling tower and two chillers, and each of the campus buildings would have rooftop air handlers that connect to the Central Plant. By centralizing the mechanical infrastructure on-site, energy efficiency would be improved throughout the campus. With a height of approximately 21 feet, the Central Plant's location would minimize its visibility from elsewhere on the campus and would not be visible to the residential properties to the west. In addition, a basketball court would be introduced in an area southwest of the existing Academic Building South, currently used for surface parking and trash compaction. Striping for a court at this location would make use of an existing, relatively flat and paved area in order to limit the need for clearing and grading.

Phase 2 would require approximately 18 months for construction, and total new building area would be approximately 61,570 square feet. During this phase of construction, modular units would be required for displaced classrooms and are planned to be located on the existing athletic field as well as in a small area immediately north of the Academic Building South, as illustrated in Figure II-5 on page 63. One modular unit located immediately north of the Academic Building South would be utilized for food service during construction of Phases 1 and 2; modular units or classroom bungalows with up to 26 classrooms would also be located on Gilley Field, with additional modular units for offices and restrooms, during the construction of Phase 2. Collectively, the modular units would cover an area of approximately 1,300 square feet within the Main Academic Campus and approximately 34,000 square feet on Gilley Field. The classroom facilities would be used for Middle and Upper School classes for approximately 18

[24] *Per LAMC §12.03, rooms housing building operating equipment or machinery are excepted from the definition of floor area. Accordingly, the proposed Central Plant is not included in the project floor area totals.*

Scale not Provided

Source: Jeffrey M. Kalban & Associates Architecture, Inc. 2006

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Figure II-5
Proposed Modular Classroom Areas

months during construction of Phase 2 (primarily during the 2010–2011 school year). Following their temporary use, the bungalows would be removed and the playing field restored.

c. Phase 3: New Academic Building West, addition to and renovation of the Existing Academic Building South, new Aquatic Center, Disney Pavilion renovation, and Lower School Renovation

Phase 3 would involve construction of the new Academic Building West, an addition to and interior renovation of the existing Academic Building South to create additional art and general classroom space, introduction of an outdoor Aquatic Center, interior renovation of portions of the Disney Pavilion, and minor aesthetic renovation of the Lower School. The Academic Building West would be located south of the arrival plaza and west of the Middle and Upper School Main Academic Center, adjacent to the central pedestrian walkway. The new two-story building would consist of 5,180 square feet designed for efficient organization of the School's administration offices and approximately two additional classroom spaces, with a maximum building height of approximately 39 feet.

The existing two-story Academic Building South would undergo a two-story addition comprising 7,000 square feet of primarily classroom space. The height of this addition would be similar to that of the existing building, or approximately 36 feet. Interior renovations to existing portions of the building would allow more efficient organization of the educational spaces to better serve the student population and accommodate current curricula. Specifically, the new classrooms would provide modern classroom space for Middle and Upper School classes. Upon completion of the addition and renovation, the Academic Building South would provide approximately 12 classrooms.

Also during Phase 3, a new outdoor Aquatic Center would be built in the northern portion of the athletic field area, as shown in Figure II-4 on page 59. A new outdoor swimming pool would replace the current indoor pool in the Disney Pavilion, which would be converted to school uses once the new pool is completed.[25] The Aquatic Center would include approximately 3,330 square feet for lockers, restrooms, a training room and office, and storage. This building would measure approximately 33 feet in height. The Aquatic Center would likely be built entirely on the existing Buckley campus, but may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future

[25] *Renovation of the existing indoor pool within Disney Pavilion would not add any floor area.*

negotiations with SMMC.[26] Placement of the Aquatic Center utilizing a portion of the existing encroachment on SMMC land would limit views of the facility from the north, south, and west. Throughout the remainder of the athletic field area, sports activities including soccer and baseball would continue, and landscaping would be added to "green" the southern portion of the campus and obscure off-site views of miscellaneous small storage buildings. The existing field grandstand would remain in place, and no night lighting would be introduced aside from essential low-level security and exit lighting.

Renovation of the Lower School would also occur during Phase 3 to better accommodate student needs and integrate this area of the campus with the new development.[27] Improvements would likely include interior renovations in certain rooms, improvements within the kindergarten lunch area, and painting of building façades to create visual consistency throughout the campus. In addition, the Lower School mechanical systems would be physically connected to the new Central Plant. These improvements would occur over the summer so as not to interrupt school activities.

Activities associated with Phase 3 would occur intermittently over the course of approximately two years, with construction of a total of approximately 15,510 square feet of floor area. Phase 3 would be divided into four sub-phase components (discussed further below) that comprise each of the development activities associated with Phase 3 (i.e., Academic Building West, Academic Building South, Aquatic Center and Disney Pavilion renovation, and Lower School renovation). No existing buildings would be removed during Phase 3.

2. Proposed Site Access

As shown in Figure II-4 on page 59, primary access to the site would continue to be provided from Stansbury Avenue. With implementation of the Campus Enhancement Plan, all vehicles entering the campus through the Stansbury Avenue entrance would either turn towards the arrival plaza, turn into the visitor parking lot and lower level of the new Parking Facility, or continue straight into the upper level of the Parking Facility. Parents, teachers, faculty, staff, students, visitors, and deliveries arriving via the Stansbury Avenue entrance would not drive beyond the northern portion of the campus. The existing drive through the campus would become a pedestrian-oriented walkway, designed and landscaped to be aesthetically compatible with The Buckley School's canyon setting and would be maintained as a 20-foot clear Fire Department emergency access route at all times.

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[26] *In the event the Aquatic Center is developed on the adjacent SMMC property, the existing outdoor basketball and weight facility would be relocated on-site to the area currently proposed for the Aquatic Center. Refer to Figure IV.H-1 within Section IV.H, Land Use, for an illustration.*

[27] *Renovation of the Lower School would not add any floor area.*

As previously discussed, the Parking Facility would provide substantially increased vehicle queuing on campus during student drop-off and pick-up periods, with an appreciably greater area for student loading and unloading than occurs with the existing campus layout. The new circulation layout would eliminate the typical queuing of vehicles on Stansbury Avenue and would introduce new landscaping areas in the northern portion of the site (described below). Limited access from Camino de la Cumbre would continue to be available for service vehicles, deliveries, some employees, athletic field access, and emergency access. New wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to eliminate an existing blind curve at the driveway.

3. Proposed Landscaping, Lighting, and Other Features

The project also includes a landscape plan designed to promote a green campus complementary to the canyon, enhance appreciation for the natural setting of the campus, and buffer the surrounding residences from campus development to the extent feasible. Particular attention would be paid to the areas affected by project development, and the edges of construction would be replanted to blend with the adjacent landscape. Landscaped courtyards, walkways, and/or patios would be introduced around the perimeter of most buildings and would include trees, seasonal gardens, or perimeter hedges. For example, rows of trees would be introduced alongside several new and existing buildings. Other hardscaped areas on-site would include trees and plants permitted by the Mulholland Scenic Parkway Specific Plan where possible, including coast live oak, California sycamore, crape myrtle, sweetgum, toyon, Arbutus 'Marina' and other native shrubs and vines. A planted grove comprised largely of sycamore trees would be introduced along the main entrance driveway, providing a transition from the mature trees on Stansbury Avenue to the new landscaping on campus, with a residential landscape oasis (i.e., plants of the type and scale occurring throughout the neighborhood) occupying the center of the arrival plaza. Additionally, the existing turtle pond (presently located adjacent to the library and administration building) would likely be recreated near its current location. Landscaping would also be added to "green" the southern portion of the campus and obscure off-site views of some of the existing small storage buildings. Furthermore, perimeter screening in the form of native shrubs and vines would be introduced around the proposed basketball court, the Aquatic Center, and the adjacent existing basketball and weight facility. The School is also evaluating the feasibility of introducing artificial turf within the athletic field area. Artificial field surfaces are considered impact-absorbing and non-abrasive, and generally require less maintenance than natural grass, do not require the use of fertilizers, and maintain an evergreen appearance for many years. Please refer to Section IV.A, Aesthetics, for further discussion of the proposed landscape plan and an associated illustrative drawing.

Additionally, the project would include an exterior illumination plan that provides for safe visibility along pedestrian routes and vehicular routes, while emphasizing the use of low intensity, energy efficient illumination sources that, to the extent practicable, minimize off-site visibility. Nighttime lighting for the athletic fields, outdoor play courts, and the Aquatic Center would be prohibited except as required for low level security and exiting purposes. For emergency purposes, an outdoor public address and warning bell system would be implemented. This system would not be used on a regular basis, and the indoor public address system and end-of-class buzzer would continue to be used within the campus buildings, as under existing conditions. In addition, any fencing introduced within the site interior would be constructed of masonry concrete block with a stucco finish, black or dark green chain link, wrought iron and/or additional materials as permitted by the Mulholland Scenic Parkway Specific Plan.[28]

The School is also evaluating the feasibility of including solar roofing materials on the roofs of some of the buildings within the campus. Photovoltaic materials could be integrated with the building design to generate a clean, renewable source of solar electrical power. If implemented, solar roofing membranes could be placed on flat portions of the roofs of the Middle and Upper School Main Academic Center, Disney Pavilion, Academic Building South, and some of the Lower School buildings. Two-foot mansards with earth-tone roof tiles would line the perimeter of these structures, partially shielding views of the roofing materials from off-site. From a distance, the solar roofing would appear as dark striping on portions of the roofs. The use of solar roofing would permit the School to generate a portion of its own electricity demand, thus yielding a beneficial impact.

4. Proposed Campus Operations

The Campus Enhancement Plan is proposed to address the instructional needs of existing and future programs provided by The Buckley School. In addition, the School is requesting a modest increase in enrollment beginning in the 2007–2008 school year with an initial enrollment increase of 20 students. A phased enrollment increase of 20 students per year would follow beginning in the 2012–2013 school year and continuing for three years, until the maximum enrollment cap of 830 students is reached in the 2014–2015 school year. The total increase of 80 students represents a modest 10.7 percent increase above the current permitted enrollment of 750 students. To accommodate these students, up to eight additional faculty members and up to eight other additional staff could be hired during this same timeframe. A resulting total of 117 full-time and 8 part-time faculty members and 51 full-time and 2 part-time staff could be present on-site by the 2014–2015 school year. For purposes of this EIR, operational impacts are analyzed for 2014, since the proposed student increase and associated increase in staff would occur in that year.

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[28] *The existing chain link and barbed wire fencing along the campus perimeter on Camino de la Cumbre is considered a legal, non-conforming structure relative to the Mulholland Scenic Parkway Specific Plan and would remain in place as part of the project.*

Under the provisions of the proposed new Conditional Use Permit (see Section F, below), the campus would continue to be open for regular instruction for up to 220 days per year, with classroom instruction to begin at 7:30 A.M. and be completed by 4:00 P.M.[29] This timeframe would provide for staggered start and end times for classes at the Lower, Middle and Upper Schools, minimizing overlap of student drop-off and pick-up times and reducing traffic entering the site. School facilities would continue to be open beginning at 7:00 A.M., and after school activities would follow regular instruction, continuing until 8:30 P.M. Faculty, staff, maintenance and security personnel could continue to be present on-site at any time in order to optimally operate the school and ensure the safety of all students and the security of campus facilities. Additionally, the School may be open for extra-curricular activities and meetings some evenings Monday to Friday until 10:30 P.M. (eight times per month, generally not to exceed two nights per week), as well as some Saturdays from 8:00 A.M. to 11:00 P.M. and some Sundays from 10:00 A.M. to 8:00 P.M. (for a combined 24 weekend days per year).[30]

5. Project Phasing and Construction

Construction of the project would be completed in three phases, based on the project components described above, over the course of approximately three and a half years, spread out over a six-year timeframe. Anticipated construction schedules are as follows: Phase 1 – two months of preparatory work beginning in March 2009, then approximately 12 months beginning in May 2009; Phase 2 – two months of preparatory work beginning in March 2011, then approximately 18 months beginning in May 2011; Phase 3 – two months of preparatory work beginning in March 2013, then 12 months of construction occurring over a two-year period beginning in May 2013. As planned, each construction phase would begin with an approximate two month period of minor preparatory work, with more intensive construction activities beginning in approximately May of each phase, coinciding with the end of the school year. Where appropriate, only the periods of intensive construction, during which heavy-duty equipment would be used, are reflected in the analyses provided in this EIR (e.g., within the construction traffic analysis, since few workers would be on-site during the two month preparatory period).

As currently planned, Phase 2 would follow a period of approximately one year with no construction subsequent to completion of Phase 1; however, the possibility exists that Phase 2 might begin as early as 2010, with some preliminary work for Phase 2 overlapping with completion of Phase 1. For purposes of a conservative analysis, a potential scenario with either

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[29] *Instruction of up to 220 days includes the regular academic year (180 days) plus the Summer Academic and Summer Enrichment Programs (six weeks).*

[30] *Exceptions to the days and hours permitted for extra-curricular activities and events are specified in Section IV.H, Land Use, of this EIR.*

consecutive implementation of Phases 1 and 2 or a slight overlapping of Phases 1 and 2 has been analyzed where appropriate (e.g., the construction traffic and air quality analyses).

Phase 3 would be divided into four sub-phase components, grouped together as a single phase for operational and construction logistics, such as balancing cut and fill materials, facilitating continued operation with the sequencing and relocation of classes during construction, and minimizing disruptions to neighboring properties. The sub-phases would be defined as follows: 3A – new Academic Building West; 3B – addition and renovation of the existing Academic Building South; 3C – new Aquatic Center and Disney Pavilion renovation; and 3D – Lower School renovation. Phase 3D would involve only interior renovations that would not add new floor area.

Furthermore, while construction activities (including interior renovations) may continue until 2015, the potential operational impacts associated with the project are linked to the proposed student enrollment increase, with the full enrollment of 830 students anticipated to occur by the 2014–2015 school year. As such, this document analyzes a project buildout year of 2014 for operational impacts, with construction impacts analyzed through 2015 where appropriate.

As previously indicated, implementation of the project would require modification of the existing topography. The project has been designed to balance cut and fill quantities on-site in order to limit the export and import of soil and avoid associated impacts, such that only nominal export or import may be needed. Much of the grading would occur in previously developed or paved areas throughout the developed portions of the site. However, some grading activities would take place adjacent to the slopes that line the canyon. Overall, grading would require an estimated 15,674 cubic yards of cut and an estimated 15,674 cubic yards of fill, with nominal (i.e., less than 1,000 cubic yards) soil import and export. All grading activities would comply with applicable City of Los Angeles grading requirements. This near balance in cut and fill operations would be achieved by utilizing cut materials from throughout the developed portion of the campus to raise the level of the athletic field by approximately 10 inches and to fill in the area surrounding the proposed Parking Facility, raising finished grade in that area by as much as 20 feet in some locations.

F. NECESSARY APPROVALS

Approvals required for development of the Campus Enhancement Plan could include, but may not be limited to, the following:

- Pursuant to LAMC §11.5.7F and Mulholland Scenic Parkway Specific Plan Section 3C, a Specific Plan Exception for relief from:

a. Mulholland Scenic Parkway Specific Plan Section 6A to allow the proposed expansion and operation of school facilities for an existing legal non-conforming school (institutional) use within the Mulholland Scenic Parkway Specific Plan's Outer Corridor; and

b. Mulholland Scenic Parkway Specific Plan Section 6D to allow one new building to exceed the maximum 40.0 feet in height allowed within the Mulholland Scenic Parkway Specific Plan's Outer Corridor, as the measurement of height is defined in LAMC §12.03.

- Pursuant to Mulholland Scenic Parkway Specific Plan Sections 6B and 5B, Environmental Findings for:

  a. a project proposed to be located within 100 feet of streams as defined by the Mulholland Scenic Parkway Specific Plan;

  b. a project with grading proposed to be located within 200 feet of parklands as defined by the Mulholland Scenic Parkway Specific Plan; and

  c. a project proposing to remove oak trees.

- Pursuant to LAMC §12.07.01A.7 and §12.24U.24(b), a new Conditional Use Permit to allow (i) demolition of existing facilities and construction of new facilities, (ii) an increase in enrollment of up to 80 students for a maximum enrollment of 830 students, and (iii) replacement of existing conditions of approval with new conditions that reflect current City standards.

- Pursuant to LAMC §12.24F, a Modification of the height regulations to allow:

  a. two buildings to exceed the maximum 36 feet permitted in a residential hillside zone as established by LAMC §12.21A 17(c); and

  b. landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre entrances in lieu of the maximum three and one-half feet otherwise permitted in the front yard and six feet otherwise permitted in the side yard in a hillside zone pursuant to LAMC §12.22C 20.

- Pursuant to LAMC §16.05, Site Plan Review findings for a development project that would result in an increase of 50,000 square feet or more of non-residential floor area.

- Approval of a Parcel Map pursuant to LAMC §17.53 to create two legal lots at the campus, one encompassing that portion of the campus within the Mulholland Scenic Parkway Specific Plan Outer Corridor, and the other encompassing that portion of the campus beyond the boundary of the Outer Corridor, including related protected tree removal approval by the Advisory Agency.

- Certification of an Environmental Impact Report.
- Review and approval from the Mulholland Scenic Parkway Design Review Board for the proposed outdoor Aquatic Center in the Mulholland Scenic Parkway Specific Plan area.
- Demolition permits to remove approximately 26,350 square feet of existing buildings, as required.
- Grading, excavation, foundation, and associated building permits, as required.
- Modification of Building Code to allow placement of new fill over uncertified fill in certain areas where removal and recompaction of existing uncertified fill is not feasible.
- Building permits and Temporary Certificates of Occupancy for modular classroom facilities to be used during construction.
- A potential modification of the yard regulations pursuant to LAMC §12.24F to allow the proposed outdoor Aquatic Center to be within the required side yard, if built in the location of the existing outdoor basketball and weight facility.
- Potential modification of building ordinances to allow the outdoor Aquatic Center to cross property lines, if built in the location of the existing outdoor basketball and weight facility.
- Other permits and approvals by the Regional Water Quality Control Board (RWQCB) and other agencies as deemed necessary.

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

A. OVERVIEW OF ENVIRONMENTAL SETTING

Aesthetics

The project site is located within a natural canyon setting on the north side of the Santa Monica Mountains, surrounded by low-density residential uses and undeveloped land owned by the Santa Monica Mountains Conservancy. The slopes surrounding the site are heavily vegetated with trees and brush. There are also a few natural outcrops with exposed bedrock along the slopes within the campus, including a small rock and water feature located within a courtyard adjacent to the administration and library buildings.

Within the project vicinity, Mulholland Drive, Beverly Glen Drive and Sepulveda Boulevard have been designated as Scenic Highways in the Transportation Element of the City of Los Angeles General Plan.[31] A portion of The Buckley School's property is within the Outer Corridor of the Mulholland Scenic Parkway Specific Plan. The Specific Plan provides guidelines for the preservation of the scenic views and resources that exist along the Mulholland Drive corridor, which include areas within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan.

The project site is visible from various public and private locations in the area. Such views are generally formed by the canyon setting of the project site. Public views of the site are available from segments of Camino de la Cumbre and Camino de Solana, areas within Fossil Ridge Park and to a limited extent from Stansbury Avenue. More distant views of portions of the site are also available from segments of residential streets south of the site such as Coy Drive and Beverly Glen near Mulholland Drive and various points along Mulholland Drive, primarily between Beverly Glen and Nicada Drive. Views from Mulholland Drive are considered inherently valuable due to its designation as a scenic parkway. However, views of the site are not available from nearby designated lookout points along Mulholland Drive, such as Stone Canyon Overlook (also referred to as Nicada Overlook) and Deep Canyon Overlook, primarily due to intervening topography. Private views of portions of the site are available from several residences on Camino de la Cumbre and Camino de Solana, as well as residential properties adjacent to the site on Stansbury Avenue. More distant private views of portions of the site are available from several residences along more distant residential streets in the project area such as

[31] *City of Los Angeles Planning Department, General Plan Transportation Element, Scenic Highways Map, 1998.*

Coy Drive, Beverly Glen, and Mulholland Drive, as well as from crest-top residences lining the eastern side of Beverly Ridge. While many of the aforementioned viewpoints offer only limited or partially obstructed views of the campus and associated development largely due to intervening vegetation, views of the site are generally less obstructed from higher elevations within the canyon. However, as distance increases from the site, particularly to the south, the campus buildings become somewhat visually obscured due to on-site landscaping, and the most prominent site feature becomes the baseball diamond within the open athletic field in the southern portion of the campus.

Ambient nighttime light levels in the project area are relatively low due to the project site's natural canyon setting and the low density of surrounding residential development. Night lighting sources in the project vicinity are limited to security and grounds lighting on The Buckley School campus, adjacent street lighting, and exterior and interior lighting on nearby residential properties. The on-site lighting is directed inward and downward and is largely shielded by the existing vegetation and landscaping, thereby blocking existing sources of light from view by the surrounding residential uses. The primary source of glare in the project area is automobiles in the main surface parking lot located in the northern portion of the project site, as well as in the smaller lot in the western area of the site. As with on-site lighting, landscaping on the project site blocks existing sources of glare from view by the surrounding residences. Further description of the project's environmental setting as it relates to the visual resources, views and light and glare is provided in Section IV.A, Aesthetics, of this EIR.

Air Quality

The project site is located in the South Coast Air Basin (Basin). Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys and lower in the far inland areas of the Basin and adjacent desert. The State and Federal governments have set health standards for air pollutants, specifying levels beyond which the air is deemed unhealthful. The Basin currently does not meet Federal and state air quality standards for O_3, PM_{10}, and $PM_{2.5,}$ and thus is currently designated a non-attainment area. Further description of the project's environmental setting as it relates to air quality is provided in Section IV.B, Air Quality, of this EIR.

Biological Resources

The majority (11.8 acres) of the project site has been mapped as developed. The existing developed areas of the campus are presently landscaped with predominantly non-native species. The slopes surrounding The Buckley School are dominated by California walnut-coast live oak woodland. Additionally, three natural drainages that contain some riparian habitat are located within the project site or adjacent to existing site development. The project site is not located within a designated Sensitive Ecological Area (SEA) within Los Angeles County.[32] In addition, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan in place for the project site. Biological surveys conducted on-site indicate that there are no Federally or State-listed plant or wildlife species visually observed on-site. Nevertheless, wildlife is still supported and animals are known to migrate through the Santa Monica Mountains. Based on the tree surveys conducted for the project, there are a total of 224 trees, 98 native and 126 non-native, within the proposed limits of grading and a 20-foot buffer area. Native trees include 37 coast live oak trees, 59 California walnut trees, and 2 California sycamores. Further description of the project's environmental setting as it relates to biological resources is provided in Section IV.C, Biological Resources, of this EIR.

Cultural Resources

After an assessment of historic records and maps, along with a cursory survey of the project site by qualified cultural resources specialists, it was determined that none of the on-site structures are eligible for Federal, State, or local historical designation, nor are they considered historic resources pursuant to Section 15064.5 of the State CEQA Guidelines. Additionally, a review conducted by the South Central Coastal Information Center (SCCIC) at California State University, Fullerton indicates that there are no recorded prehistoric or historic archaeological resources located within a one-half mile radius of the project site. However, the project site is located in an area known to be rich in paleontological resources. Surficial deposits of Quaternary Alluvium supported by bedrock deposits of the marine Late Miocene Modelo Formation (also known as the Monterey Formation in the area) underlying the project site has produced several important vertebrate fossils within a half-mile radius of the project site. Marine fossil vertebrates of sharks, fishes, and seahorses, including an uncommon fossil of a sperm whale, have been found in the project vicinity. Further description of the project's environmental setting as it relates to cultural resources is provided in Section IV.D, Cultural Resources, of this EIR.

Geology

The project site consists of a north draining canyon situated on the north side of the Santa Monica Mountains. Natural slopes ascend from the graded areas to the west up to Camino De La Cumbre Avenue at an average of 2:1 slope gradient. Natural slopes ascend above the east side of the canyon between 275 feet high at a 1.8:1 gradient and 325 feet high at an overall 2:1 slope gradient. Active named faults exist within the general vicinity of the project site and include the

[32] *County of Los Angeles, Los Angeles County Significant Ecological Area Update Study, November 2000.*

Santa Monica-Hollywood Fault, the Newport-Inglewood Fault, and the Malibu Coast Fault.[33] The nearest locally active fault line is the Santa Monica-Hollywood fault located 4.2 miles south of the project site. According to the California Geologic Survey, un-named and potentially active and inactive faults are also located in the general area. However, according to the California Geologic Survey within the Department of Conservation, the project site is not located within an Alquist-Priolo Earthquake Fault Rupture Hazard Zone[34] nor is it located within a liquefaction zone.[35] The project site is, however, located within a delineated landslide hazard zone as mapped in the California Geologic Survey (CGS) Seismic Hazard Zone Map (Van Nuys Quadrangle). Additionally, the site has been identified by the City of Los Angeles as being within an area identified for clusters of landslides.[36] Further description of the project's environmental setting as it relates to geology is provided in Section IV.E, Geology, of this EIR.

Hazards and Hazardous Materials

Hazardous materials used and stored on the project site are typical of those handled for educational uses and are utilized in nominal quantities. Potentially hazardous materials occurring on-site include gasoline, diesel fuel, paint, spray paint, adhesives, coatings, stains, seals, compressed gases, chlorine and other pool chemicals. In addition, small quantities of various laboratory chemicals, glazes, stains, and print chemicals are used.

The project site appears on the Resource Conservation and Recovery Information System-Small Quantity Generator (RCRIS-SQG), Facility Index System (FINDS), Hazardous Waste Information System (HAZNET), California Facilities Inventory Database (CA FID UST), Leaking Underground Storage Tank (LUST), Hazardous Waste and Substance Sites (Cortese), and Emergency Response Notification System (ERNS) lists. The RCRIS-SQG, FINDS, and HAZNET listings pertain to small quantities of waste that are generated at the project site (i.e., science laboratory chemical waste, etc.). The CA FID UST listing pertains to a permitted underground storage tank (UST). These listings in and of themselves do not present a concern. The LUST, Cortese, and ERNS listings pertain to a release from a UST that occurred in 1988. (This UST was subsequently removed from the site with regulatory oversight). The Buckley School was constructed in the late 1960's to early-1970's (prior to regulation of certain hazardous materials in 1979). As such, the presence of asbestos-containing materials (ACM) has

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[33] *California Department of Conservation, California Geologic Survey, Digital Database of Faults from the Fault Activity Map of California and Adjacent Areas, 1994.*

[34] *California Department of Conservation, California Geologic Survey, Alquist-Priolo Fault Rupture Hazard Zones Index Map 4D, updated September 26, 2003.*

[35] *California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zones, Van Nuys Quadrangle, 1998.*

[36] *Figure GS-4, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report.*

been confirmed in some of the buildings located on-site. Based on surveys conducted, no lead-based paint are found on-site. The Phase II site assessment confirmed the presence of a small (approximately 10 feet by 4 feet) anomaly believed to be a UST in the vicinity of the former bus maintenance garage. Based on the size and location of the anomaly, it is assumed to have been a waste oil tank. Further description of the project's environmental setting as it relates to hazardous materials is provided in Section IV.F, Hazards and Hazardous Materials, of this EIR.

Hydrology and Water Quality

The project site lies within a 156-acre watershed, consisting of five sub-areas. Stormwater runoff from the campus drains to the main drainage line managed by the Los Angeles Department of Public Works. This main line measures 51 inches at the extension of Stansbury Avenue and 57 inches at Stansbury Avenue. Most of the storm water runoff is generated on-site. Based on site observations, the only offsite runoff that enters the site flows from an area upslope and adjacent to the athletic field. On-site surface runoff drains downhill (from south to north) and westward toward the central region of the site. Runoff flows for the project site are not collected at any specific point. Rather, runoff flows are conveyed via swales, gutters, drains, catch basins, and drainage pipes to the main drainage line. Further description of the project's environmental setting as it relates to hydrology and surface water quality is provided in Section IV.G, Hydrology, of this EIR.

Land Use and Planning

The project site is located in a canyon setting within the Santa Monica Mountains. The project site is generally bounded by Camino de la Cumbre on the west, residential uses on the north, and the 44-acre Fossil Ridge Park owned by the Santa Monica Mountains Conservancy (SMMC) on the east and southeast.

Based on the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the majority of the approximately 18.3-acre Buckley School campus is designated for Minimum Density Residential uses and a small portion, located east of Camino De La Cumbre, is designated for Very Low Residential uses. The project site is currently zoned RE40-1-H (Residential Estate, Height District 1, Hillside) within the City of Los Angeles Planning and Zoning Code (Chapter 1 of the LAMC). The existing school uses are permitted and operated on the site pursuant to a CUP approved in 1965 by the City of Los Angeles Planning Commission. Approximately 3.28 acres of the southern portion of the campus is within the Mulholland Scenic Parkway Specific Plan Area. Further description of the project's environmental setting as it relates to land use is provided in Section IV.H, Land Use, of this EIR.

Noise

Some land uses are considered more sensitive to intrusive noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses. Noise-sensitive land uses (sensitive receptors) in the project vicinity consist of single-family residences that are located immediately north and west of the project site. Noise sources within the vicinity of the project site include vehicular traffic along local streets, as well as outdoor activity on the project site (e.g., student use of the athletic field and court areas). Other community noise sources include landscaping maintenance activities at local residences as well as on the project site. The only source of ground-borne vibration in the project vicinity is vehicular travel (refuse trucks, delivery trucks, and school buses) on local roadways. Existing ground-borne vibration levels within the project vicinity from these sources are negligible. Further description of the project's environmental setting as it relates to noise is provided in Section IV.I. Noise.

Transportation and Circulation

Primary access to the project site is provided via Stansbury Avenue, south of Valley Vista Boulevard. Secondary access is provided via a small driveway from Camino de la Cumbre. Peak traffic periods for the School include the A.M. peak period (AM peak), the P.M. peak period during school hours (School PM peak), and the P.M. peak period within the period for commuter traffic (commuter PM peak). The morning peak hour occurs from 7:45 A.M. to 8:45 A.M., the School PM peak hour occurs from 3:00 P.M. to 4:00 P.M., and the commuter PM peak hour occurs from 4:15 P.M. to 5:15 P.M. During the morning and afternoon peak hours, parking attendants and security personnel on the campus and on Stansbury Avenue direct traffic flow into and out of the site at the Stansbury Avenue gate to expedite morning and afternoon arrivals and departures. Staff members also help load and unload students during peak periods to improve the efficiency of the drop-off area. However, due to insufficient queuing space at the project site, the queuing of vehicles is typical along Stansbury Avenue in the morning and School PM peak hours.

Approximately 214 on-site marked parking spaces are provided for student carpools, faculty and staff, with an additional 100 leased parking spaces at the Sherman Oaks Fashion Square parking lot, located at the southwest corner of Riverside Drive and Woodman Avenue. Students who park in this lot are required to have registered permission with the School and are shuttled to campus via a shuttle bus operated by the School's contracted bus service provider. A "good neighbor" policy has been adopted, which prohibits on-street parking on neighboring streets by students or faculty. Students who are found to be parking in the neighborhood are subject to detention and/or suspension of driving privileges. Further description of the project's environmental setting as it relates to traffic and circulation is provided in Section IV.G. Transportation and Circulation, of this EIR.

B. RELATED PROJECTS

Section 15130 of the California Environmental Quality Act (CEQA) requires that Environmental Impact Reports (EIRs) analyze cumulative impacts of a project. The analysis of cumulative impacts need not be as in-depth as what is provided relative to the proposed project, but rather is to "be guided by the standards of practicality and reasonableness." CEQA Guidelines Section 15355 further defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."

Cumulative impacts are anticipated impacts of the project along with reasonably foreseeable growth. According to CEQA Guidelines Section 15130(b) (1), reasonably foreseeable growth may be based on either of the following:

- A list of past, present, and probable future projects producing related or cumulative impacts including, if appropriate, those projects outside the control of the agency; or

- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact.

Cumulative study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual environmental impact issue may vary. For example, a cumulative visual impact generally could only affect the area within the view of the project site, while a cumulative air quality impact could affect the entire South Coast Air Basin. The specific boundaries and the projected growth within those boundaries for the cumulative study area of each environmental issue are identified in the applicable environmental issue section in Chapter IV, Environmental Impact Analysis, of this EIR.

Based on information provided by the Los Angeles Department of Transportation, there are 29 related projects within the project vicinity. These projects are described in Table III-1 on page 79 and are shown in Figure III-1 on page 81.

Table III-1

Related Projects

Map No.	Location	Project	Size
1	5638 Sepulveda Boulevard	Hotel	96 rm
2	5628 Sepulveda Boulevard	Fast-Food Restaurant with Drive-Thru	2,437 sf
3	5546 Sepulveda Boulevard	Car Wash	10,737 sf
4	Burbank Boulevard e/o Sepulveda Boulevard	Condominium	15 du
5	15357 Magnolia Boulevard	Apartment	98 du
6	Magnolia Boulevard w/o Kester Avenue	Condominium	12 du
7	14850 Burbank Boulevard	Gas Station with Convenience Market	1,722 sf
8	5746 Van Nuys Boulevard	New Car Dealership	48,017 sf
9	5344 Van Nuys Boulevard	Automobile Sales	40,852 sf
10	5300 Coldwater Canyon	Self Storage	60,250 sf
11	12828 Riverside Drive	General Office	29,475 sf
12	13256 Riverside Drive	Gas Station with Convenience Market	N/A
13	13401 Riverside Drive	Apartments	142 du
14	13900 Riverside Drive	Westfield Fashion Square (expansion)	220,000 sf
15	13920 Ventura Boulevard	Pharmacy	11,244 sf
16	Hazeltine Avenue/Moorpark Street	Condominiums	50 du
17	14121 Ventura Boulevard	Retail Restaurant Fast-food restaurant w/o drive thru Apartment	6,000 sf 7,000 sf 3,500 sf 118 du
18	14478 Ventura Boulevard	Gas Station	392 sf
19	Moorpark St. e/o Van Nuys Boulevard	Condominiums	24 du
20	4454 Van Nuys Boulevard	Condominiums	98 du
21	4500 Van Nuys Boulevard	Electronics Store Theater (to be removed)	60,000 sf 928 seats

Table III-1 (Continued)

Related Projects

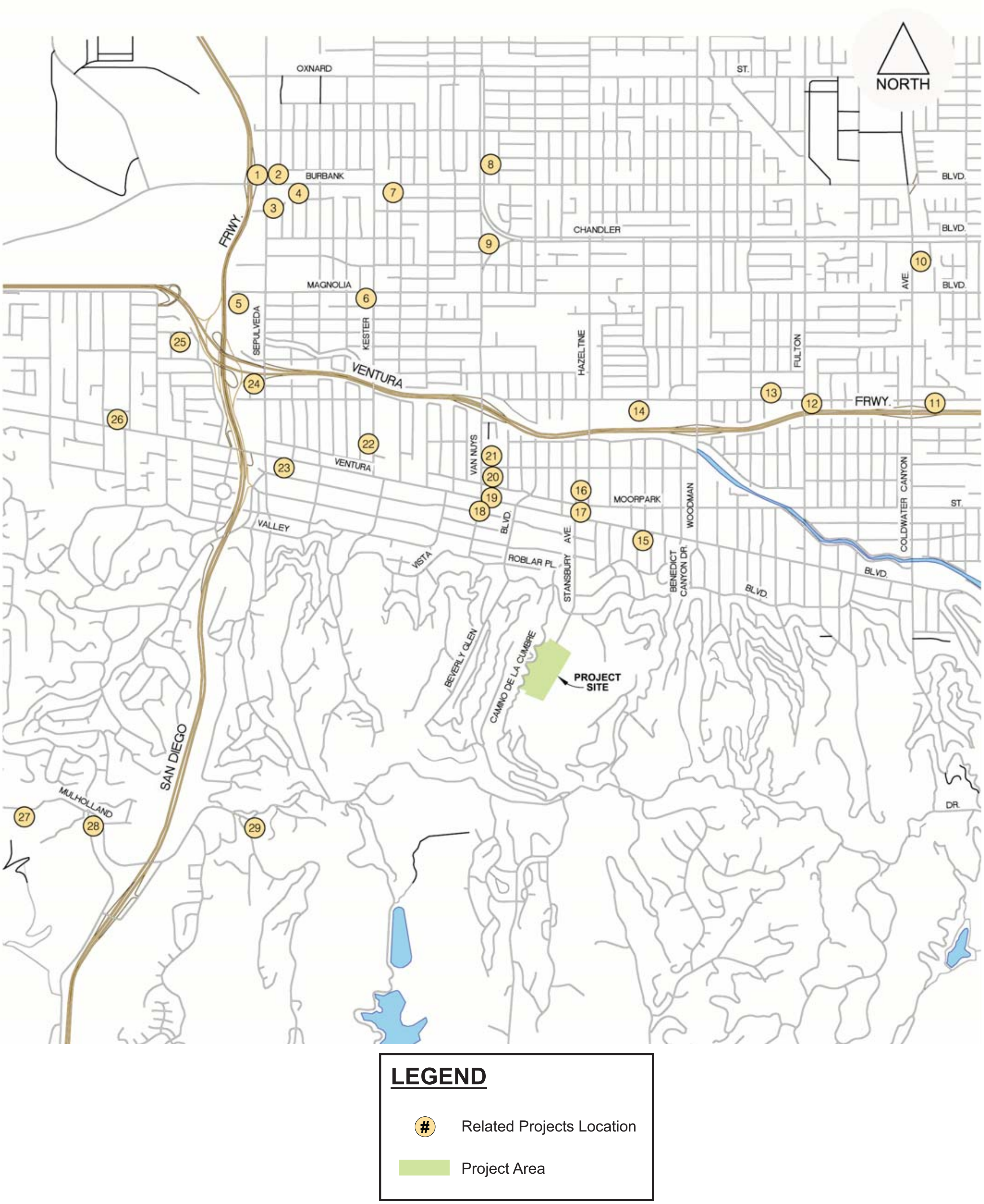
Map No.	Location	Project	Size
22	Kester Avenue. n/o Moorpark Street	Apartments	8 du
23	15222 Ventura Boulevard	Condominium	52 du
24	4805 Sepulveda Boulevard	Il Villaggio Toscano Apartment Grocery Store Specialty Retail Apartment (to be removed) Single-Family Housing to Be Removed Office (to be removed)	 500 du 45,000 sf 10,000 sf (24) du (11) du (52,452) sf
25	15530 Hesby Street	LAUSD Magnet School (K-8)	528 students
26	15821 Ventura Boulevard	Bank	6,400 sf
27	16200 Mulholland Drive*	K-8 School Pre-School Middle School (to be removed) Pre-School (to be removed)	240 students 60 students (240 students) (60 students)
28	15900 & 16100 Mulholland Drive **	Stephen S. Wise Consolidated Middle/High School & Athletic Field	890 students (650 existing High School students, 290 existing Nursery School students to be removed)
29	15500 Stephen S. Wise Drive **	Stephen S. Wise Temple Nursery School	290 students

sf = square feet
du = dwelling units
rm = rooms
N/A = Not Applicable

* *The existing 240-student Stephen S. Wise Temple Middle School will be replaced with a 240-student K-8 school. An existing 60-student preschool will also be replaced with a new 60-student preschool.*

** *The 290-student Nursery School at 16100 Mulholland will be moved to 15500 Stephen S. Wise Drive.*

Source: Crain and Associates, March 2006.



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N

Not to scale

Source: Crain & Associates, 2006.

Figure III-1
Related Projects Map

IV. ENVIRONMENTAL IMPACT ANALYSIS
A. AESTHETICS, VIEWS AND LIGHT AND GLARE

This analysis addresses aesthetics, views, and light and glare. The aesthetics analysis determines the extent to which the design characteristics of the proposed improvements would be compatible with the existing visual character of the project site and its surroundings. The views analysis addresses visual access to prominent visual elements, such as the Santa Monica Mountains, and view quality along designated view corridors, such as Mulholland Drive. The analysis of light impacts addresses changes to the nighttime character of the project area due to project illumination. The analysis of glare addresses effects caused by the reflection of sunlight or artificial light on highly polished surfaces such as window glass or reflective materials.

1. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Visual Character of the Existing Project Site

The approximately 18.3-acre Buckley School campus is situated within a natural canyon setting on the north side of the Santa Monica Mountains and includes approximately 99,150 square feet of building area, described further below. The topography of the site varies from approximately 750 feet above mean sea level (asl) within the northern part of the project site to more than 900 feet asl within the southern portion of the site. The campus is located within the lower portion of the canyon. Natural slopes border the central, developed areas of the site on both the east and west, rising at an approximately 2:1 slope gradient.[37] The slopes are generally vegetated with native trees and brush dominated by California walnut-coast live oak woodland that includes California walnut and coast live oak in the tree canopy; scrub oak, toyon, Mexican elderberry, sugarbush, and lemonadeberry in the shrub layer; and an understory consisting of leaf litter, black mustard, brome, fuchsia-flowered gooseberry, phacelia, and giant wild rye.[38] The developed areas of the site contain primarily ornamental landscaping dominated by a variety of non-native plantings (e.g., cherry and plum trees, pepper tree, bluegum eucalyptus, southern magnolia, fig, ash, jacaranda, olive, pine, wingleaf soapberry, cajeput tree, pittosporum,

[37] *The J. Byer Group, Inc., Geologic and Geotechnical Engineering Report, February 3, 2006 (included as Appendix F to this EIR).*

[38] *PCR Services Corporation, Tree Survey Report for The Buckley School Campus Enhancement Plan, May 2006 (included as Appendix D to this EIR).*

honeylocust, Chinese elm, avocado tree, and juniper), as well as California walnut, coast live oak, and California sycamore trees scattered throughout the campus, and the grass covered athletic field in the southern portion of the site.[39] There are also a number of natural outcrops with exposed bedrock along the slopes within the campus, including a small rock and water feature (referred to as the turtle pond) located within a courtyard adjacent to the administration and library buildings. Please refer to Figure II-2 in Section II, Project Description, of this EIR for an aerial view of the site and Figure IV.A-1 on page 84 for a photo depicting the campus's canyon setting, existing buildings and vegetation, and some of the site's surrounding uses.

As shown in the existing site plan provided in Figure II-3 in Section II, Project Description, the Lower School (Kindergarten through Grade 5) is located within the northwestern portion of the campus and includes several buildings that comprise approximately 26,500 square feet of building area. The Middle School (Grades 6 through 8) and Upper School (Grades 9 through 12) utilize several buildings located to the east within the more central portions of the site. These buildings include classroom buildings comprising approximately 32,000 square feet of floor area; the Disney Pavilion (29,000 square feet), which houses a swimming pool and gymnasium; and other accessory areas. The remainder of the campus structures comprise approximately 11,650 square feet of building area and include an athletic field house, guard house, the Milk House, a transportation building, outdoor play court storage building, and maintenance building. Several temporary storage buildings are also located throughout the site. The academic and associated buildings that comprise the core of the Lower, Middle, and Upper Schools are located on what is referred to herein as the Main Academic Campus, which is differentiated from uses and structures located at a higher elevation within the athletic field area, referred to as Gilley Field. Please refer to Figure IV.A-2 on page 85 for photos of existing campus development. As shown, the existing buildings have one to two stories ranging from approximately 13 feet to a maximum height of 38 feet and include stucco and slumpstone exteriors with clay tile roofs, generally suggesting a Southern California vernacular architecture. A number of covered walkways and courtyards exist between buildings. Most of the rooftops are flat in the center of each building, with gently sloping mansard roofs extending up from the eave lines and covered with Spanish-style tiles. In addition, an athletic field (with a baseball diamond, softball pitch, and soccer field), basketball courts, and play areas are located within the campus. Other notable site features include the turtle pond, a Bell Tower at the Lower School (shown in Figure IV.A-2), a backlit changeable sign near the campus entrance, and a concrete grandstand adjacent to the athletic field (shown in Figure IV.A-2).

Approximately 3.28 acres of the southern portion of the Buckley campus lie within the Mulholland Scenic Parkway Specific Plan (MSPSP) area, established in 1992. Specifically, as

[39] *PCR Services Corporation, Tree Survey Report for The Buckley School Campus Enhancement Plan, May 2006 (included as Appendix D to this EIR).*

View from campus looking south into the canyon (off-site residences located in background, upslope of campus).

PCR

Figure IV.A-1
Canyon Setting of the Buckley Campus

Source: PCR Services Corporation, 2006

Covered walkway adjacent to the Disney Pavilion.

Lower School buildings and Bell Tower, with northern surface parking lot in the foreground.

Athletic Field.

Outdoor lunch area and Milk House.

Courtyard with rock and water feature adjacent to the library and administration buildings.

PCR

Figure IV.A-2
Photographs of the Existing Project Site

Source: PCR Services Corporation, 2006

shown in Figure IV.H-4 in Section IV.H, Land Use, of this EIR, this southern portion of the site is located within the “Outer Corridor,” as defined by the MSPSP and described further below.

(2) Visual Character of Surrounding Areas

The project site is located on the north side of the Santa Monica Mountains, which are recognized for their high scenic value. The site is surrounded to the north and west by single-family residential uses, and to the east and south by Fossil Ridge Park owned by the Santa Monica Mountains Conservancy (SMMC). Additional residential uses are located further east and south of the park. In general, the residential properties in the project area are landscaped and/or include substantial natural mature vegetation, while Fossil Ridge Park and the surrounding hillsides are generally vegetated with native brush and trees. The homes located immediately west of the site are on a hillside overlooking portions of the campus and/or the valley to the north. Given the winding nature of Camino de la Cumbre and the steep slope of the hillside, several of these large-scale homes have a strong presence as viewed from the campus. Vegetation in this area includes oak, palm, eucalyptus, and flowering jasmine trees, as well as bamboo, cactus, and jade plants.

Approximately 0.5 miles south of the site, Mulholland Drive, a City-designated Scenic Parkway, follows the crest of the Santa Monica Mountains. Public views along the Mulholland Drive corridor include steep natural slopes and dramatic views of surrounding urban areas. The general appearance along Mulholland Drive is one of prevailing vegetation and open spaces with interspersed buildings, which contribute to the natural feel of the corridor. A buffer area including and paralleling much of Mulholland Drive has been designated as the Mulholland Scenic Parkway, with an Inner Corridor and Outer Corridor established to encourage the protection of the area’s views and natural character. A designated Institutional Use Corridor, where a variety of school and religious uses are concentrated, also exists along the corridor to the west of the project area, on either side of the I-405 Freeway.

(3) View Resources and View Locations

View resources in the area include the natural canyon setting, existing vegetation and landscaping throughout the area, prominent ridges surrounding the canyon (e.g., within Fossil Ridge Park), and the San Fernando Valley and Santa Susana Mountains in the distance to the north, each of which are described herein. Most of the view locations evaluated herein offer views of some or all of these resources.

Portions of the project site are visible from various public and private locations in the area. Such views are generally formed by the canyon setting of the project site. Public views of the site are available from segments of Camino de la Cumbre and Camino de Solana, areas within Fossil Ridge Park, and to a limited extent from Stansbury Avenue.[40] More distant views of portions of the site are also available from segments of residential streets south of the site such as Coy Drive and Beverly Glen near Mulholland Drive and various points along Mulholland Drive, primarily between Beverly Glen and Nicada Drive. Views from Mulholland Drive are considered inherently valuable due to its designation as a scenic parkway. However, views of the site are not available from nearby designated lookout points along Mulholland Drive, such as Stone Canyon Overlook (also referred to as Nicada Overlook) and Deep Canyon Overlook, primarily due to intervening topography. Private views of portions of the site are available from several residences on Camino de la Cumbre and Camino de Solana, as well as residential properties adjacent to the site on Stansbury Avenue. Longer range private views of portions of the site are available from several residences along more distant residential streets in the project area such as Coy Drive, Beverly Glen, and Mulholland Drive, as well as from crest-top residences lining the eastern side of Beverly Ridge. A more detailed discussion of views from Mulholland Drive, Fossil Ridge Park, and nearby residential streets is provided below.

While many of the aforementioned viewpoints offer only limited or partially obstructed views of the campus and associated development largely due to intervening vegetation, views of the site are generally less obstructed from higher elevations within the canyon. However, as distance increases from the site, particularly to the south, the campus buildings become somewhat visually obscured due to on-site landscaping, and the baseball diamond becomes the most prominent site feature within the open athletic field in the southern portion of the campus.

(a) Views from Mulholland Drive

The Mulholland Drive corridor, a winding two-lane road, is recognized for its scenic features and recreational value. It provides both panoramic City views and a naturalistic setting with topographic variation. Travelers along Mulholland Drive in the vicinity of The Buckley School are provided only brief views of the site due to the corridor's tight angles, intervening topography and vegetation, and automobile travel speeds. The most notable views of the site from Mulholland Drive occur between Beverly Glen and Nicada Drive. Please refer to Figure IV.A-3 on page 88 for a photo location map; Photographs 1 and 2 in Figure IV.A-4 on page 89 depict views from two vantage points along Mulholland Drive. As shown in these photos, the baseball diamond on site serves as a visual identifier for the campus, and the school buildings are nearly indistinguishable from other residential structures in the area. The long-range views extend well beyond the campus to the San Fernando Valley and Santa Susana Mountains in the distance. Due to the topography of the canyon, campus development does not impede views of off-site valuable scenic resources. The MSPSP recognizes Mulholland Drive as a scenic

[40] *While views of the campus are technically available from Fossil Ridge Park, which is public parkland, there are few accessible areas or trails that permit such views.*

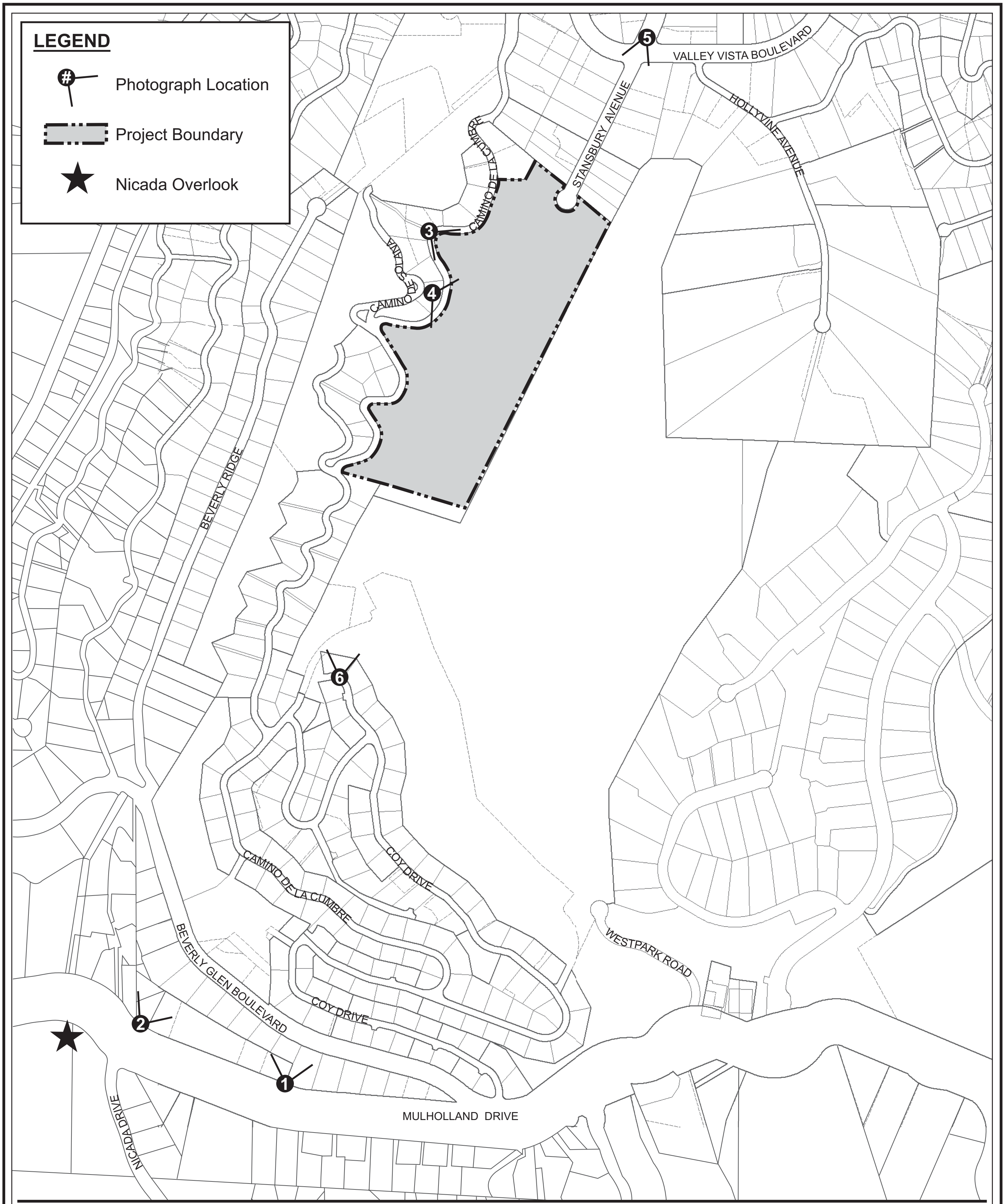
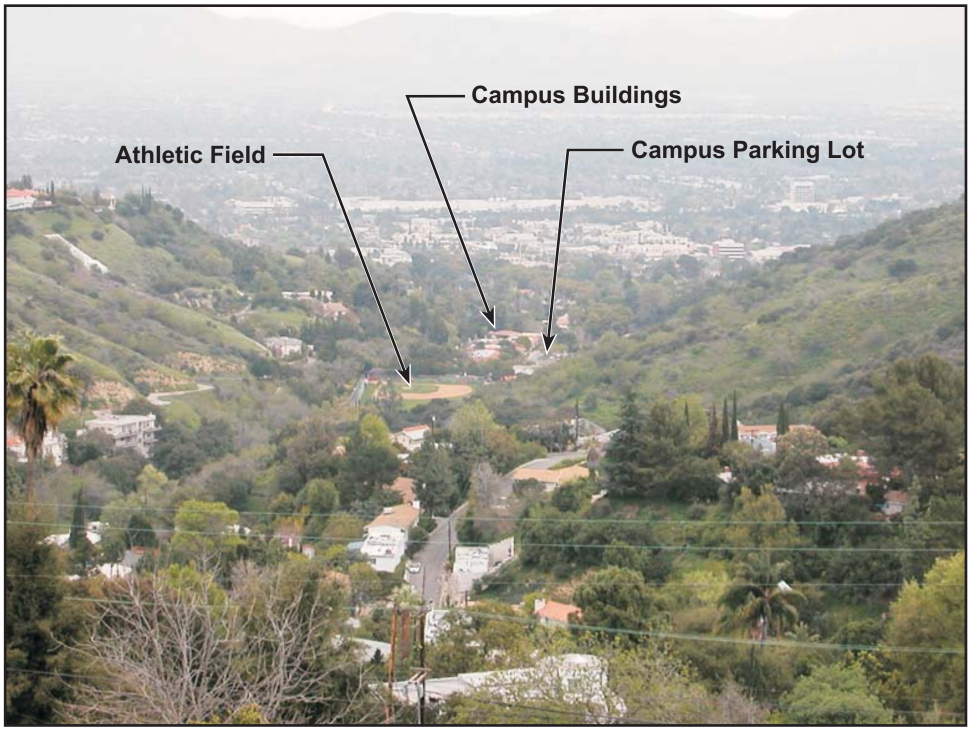
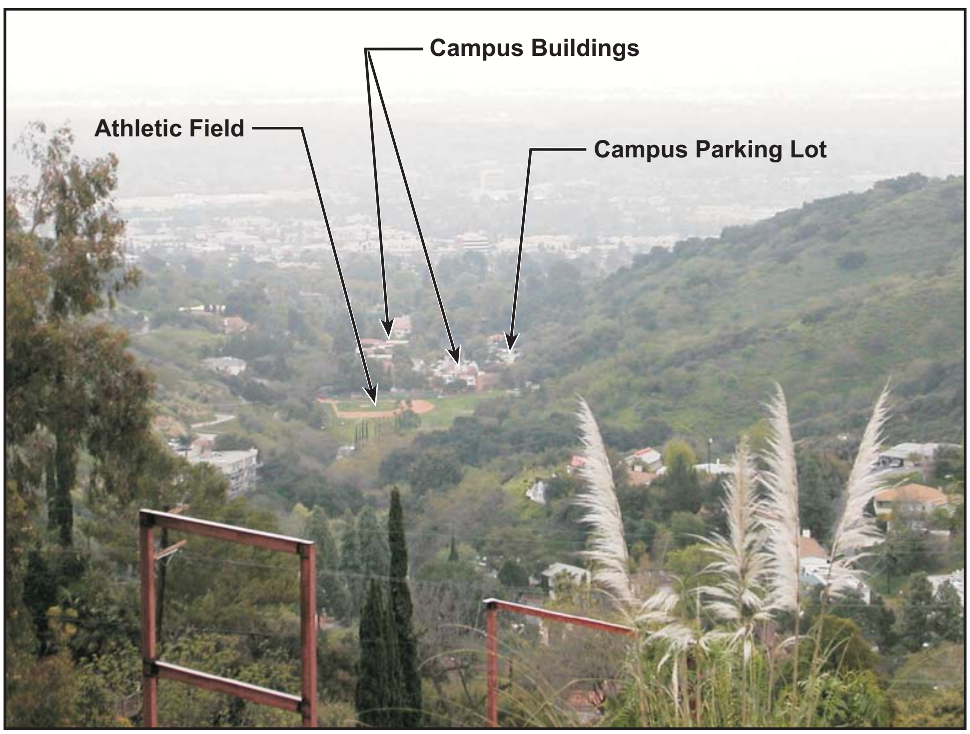


Figure IV.A-3
Photo Location Map

Source: PCR Services Corporation, 2006



Photograph 1: View from Mulholland Drive west of Beverly Glen Boulevard (near 14405 Mulholland Drive) looking north.



Photograph 2: View from Mulholland Drive near Nicada Drive looking north.

PCR

Figure IV.A-4
Views of the Project Site from Mulholland Drive

Source: PCR Services Corporation, 2006

parkway and identifies vista points that give travelers expansive views of the surrounding terrain and valleys below. The closest vista points to the project site are the Stone Canyon Overlook (or Nicada Overlook) and Deep Canyon Overlook (both shown in Figure IV.H-4 in Section IV.H, Land Use), located approximately 0.5 mile southwest and 0.75 mile southeast, respectively, from the project site. As previously mentioned, views of the site are not available from the overlooks due to intervening ridgelines.

(b) Views from Fossil Ridge Park

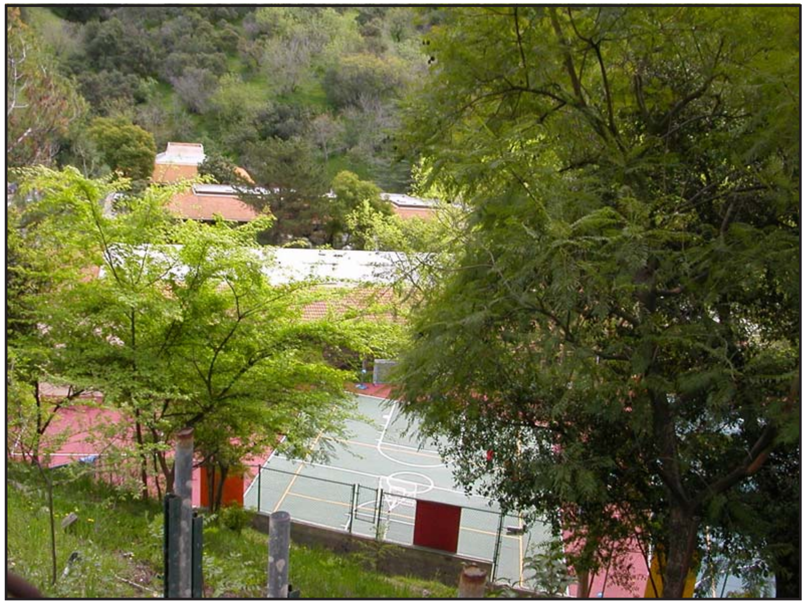
Fossil Ridge Park is a public open space area owned by SMMC. The park is thickly covered with vegetation and includes a major ridge, designated as a prominent ridge within the MSPSP (see Figure IV.H-4 in Section IV.H, Land Use, of this EIR). There are few areas or trails within the park that are accessible by foot. Thus, while views of the campus are technically available from Fossil Ridge Park, there are few locations that permit such views. In any case, views from the park are intermittent at best, largely obscured by existing trees and brush. The majority of Fossil Ridge Park is located within the MSPSP's Outer Corridor.

(c) Views from Local Residential Streets

Both public and private views of portions of The Buckley School site are available from locations along Camino de la Cumbre, Camino de Solana, and the southern end of Stansbury Avenue, as well as residential streets south of the site such as Coy Drive and Beverly Glen near Mulholland Drive. Although public viewing opportunities do not exist along Beverly Ridge, located at the top of the ridge west of the project site, many of the residences along the eastern side of the street have private views of the school grounds. Views from these locations are described below, and a photo location map is provided in Figure IV.A-3.

Camino de la Cumbre and Camino de Solana offer the most opportunities for short-range views of the site. Views from the street and several of the single-family residences are intermittent due to visual obstruction by natural hillside vegetation and campus landscaping, as shown in Photograph 3 in Figure IV.A-5 on page 91. However, a few residences are situated at vantage points that provide direct views of the entire canyon, including the School, and the valley and Santa Susana Mountains to the more distant north, as shown in Photograph 4 in Figure IV.A-5. Similarly, private vantages within residences on Beverly Ridge offer wide canyon views looking down upon the campus.

Along Stansbury Avenue, due to the relatively flat topography, existing development and existing landscaping, views are generally limited to nearby areas. Views of the project site are specifically limited due to mature trees lining the roadway and the narrowness of the campus entrance, as shown in Photograph 5 in Figure IV.A-6 on page 92. The homes located at the



Photograph 3: View from Camino de la Cumbre (through the chain link fence across from 3873 Camino de la Cumbre).

Photograph 4: View from 3852 Camino de Solana (pan graphic looking northeast to south).

PCR

Figure IV.A-5
Views of Project Site from Surrounding Locations

Source: PCR Services Corporation, 2006

Photograph 5: View from Stansbury Avenue at Valley Vista Boulevard looking south towards the campus entrance.

Photograph 6: View from the terminus of Coy Drive looking north.

PCR

Figure IV.A-6
Views of Project Site from Surrounding Locations

Source: PCR Services Corporation, 2006

southern end of Stansbury Avenue closest to The Buckley School have opportunities for private views of the site, although existing trees and landscaping provide a visual buffer of the site.

The residential neighborhood to the south of the site encompasses the southern segment of Camino de la Cumbre, Camino de la Cumbre Place, Coy Drive, Glorietta Drive and Place, and Beverly Glen near Mulholland Drive. The topography of this neighborhood varies greatly such that some street segments have views of the site and others do not. A portion of Fossil Ridge Park runs between the school campus and this neighborhood, and existing vegetation therein obstructs views from various viewpoints. Please refer to Photograph 6 in Figure IV.A-6 for a view of the campus from the terminus of Coy Drive.

(4) Light and Glare

Given the project site's natural canyon setting and the low density of surrounding residential development, ambient nighttime light levels in the project area are relatively low. Night lighting sources in the project vicinity are limited to security and grounds lighting on The Buckley School campus, adjacent street lighting, and exterior and interior lighting from nearby residential properties. Campus lighting includes lamppost lights in the surface parking lot and minimal security lighting along the on-site roadway and campus walkways. The on-site lighting is directed inward and downward and is largely shielded by existing landscaping and vegetation, thereby limiting visibility from surrounding residential uses, which are considered light sensitive uses. Aside from minor lighting visible on the backlit changeable sign near the campus exit, there are no other sources of nighttime illumination on-site.

Off-site night lighting includes pole-mounted streetlights on some of the residential streets in the project area (i.e., Stansbury Avenue, Valley Vista Boulevard, and Sherwood Place, but not on Camino de la Cumbre, Hollyvine Avenue, or Witzel Drive). Many of the residences in the vicinity have landscape accent lighting and driveway visibility lights that are generally shielded and low to the ground. Additionally, a number of residences also have outdoor swimming pools or tennis courts with outdoor pole-mounted lighting. Despite the presence of streetlights, roadways such as Stansbury Avenue that are lined with thick canopy trees do not exhibit significantly bright ambient lighting.

Sources of glare within the project site are generally limited to automobiles in the main surface parking lot located in the northern portion of the project site, as well as in the smaller lot in the western area of the site. Sunlight may also be reflected from campus building windows and glass doors during certain times of the day and certain seasons. Additionally, minimal sources of glare include backboards in the basketball courts in the western and southeastern areas of the campus and the concrete grandstand adjacent to the athletic field at the southern end of campus.

Glare originating from surrounding off-site uses is limited due to the heavily vegetated and/or landscaped nature of neighboring properties. Automobiles traveling on adjacent roadways, such as Camino de la Cumbre and Stansbury Avenue, offer the greatest potential for glare generation.

b. Regulatory Framework

(1) Mulholland Scenic Parkway Specific Plan

Mulholland Drive is designated as a Scenic Highway in the Transportation Element of the City of Los Angeles General Plan.[41] The Transportation Element states that a Corridor Plan may be incorporated into the Community Plans (in the case of the project, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, discussed in Section IV.H, Land Use) that encompasses the designated highway. The Mulholland Scenic Parkway Specific Plan was adopted on May 13, 1992 as part of the City's General Plan in order to protect the views and natural character of Mulholland Drive. As mentioned above, a buffer area including and paralleling much of Mulholland Drive has been designated as the Mulholland Scenic Parkway.

As previously discussed, the southern 3.28 acres of the Buckley campus lie within the MSPSP Outer Corridor, as illustrated in Figure IV.H-4 in Section IV.H, Land Use. The Outer Corridor is defined as the area extending 0.5 mile from the Mulholland Drive right-of-way, excluding the Inner Corridor; the Inner Corridor extends 500 feet from the right-of-way along both sides of Mulholland Drive.

The intent of the MSPSP is to assure maximum preservation and enhancement of unique scenic resources and features within the MSPSP area, particularly in the Inner Corridor; to assure land use compatibility; to assure that the design and placement of buildings preserve, complement and/or enhance views from Mulholland Drive; to minimize grading and assure graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains; to preserve the natural topographic variation within the Inner and Outer Corridors; to reduce the visual intrusion caused by excessive lighting; to protect prominent ridges and topographic features; and to provide a review process for all projects visible from Mulholland Drive.

MSPSP requirements relevant to the project's potential aesthetic, view, light, and glare impacts address ridge protection, grading restrictions, oak tree removal, and permitted building heights. MSPSP requirements supplement and in some cases supersede the requirements of the City's Zoning Code. More specifically, Section 6 of the MSPSP specifies Outer Corridor

[41] *City of Los Angeles, Transportation Element of the General Plan, adopted by City Council September 8, 1999.*

regulations that include the environmental protection measures referenced in Section 5 (Inner Corridor Regulations), along with grading and height limitations specific to Outer Corridor development. Although only a portion of the project site is located within the Outer Corridor, the entire site is subject to the following MSPSP requirements:[42]

- Prominent ridges shall not be graded, altered or removed without the prior written approval of the Director [of the City Planning Department].

- Buildings and structures visible from Mulholland Drive shall not be constructed on the top of or within 50 vertical feet of the top of a prominent ridge without the prior written approval of the Director.

- No oak tree shall be removed, cut down or moved without the prior written approval of the Director.

- No grading in excess of two cubic yards per four square feet of lot area per lot visible from Mulholland Drive shall be permitted without the prior written approval of the Director. The Director may approve grading up to four cubic yards per four square feet of lot area [based on the necessary findings].

- The height of any building or structure visible from Mulholland Drive shall not exceed 40 feet.

The MSPSP also specifies required design review procedures and findings that must be made for the Director's approvals indicated above. The project would be subject to review by the Mulholland Scenic Parkway Design Review Board. As stated within the MSPSP, the Design Review Board plays an advisory role with respect to conditional uses and associated approvals by the City Planning Commission. The Design Review Board, however, cannot amend any previously approved discretionary actions. MSPSP restrictions on land use and other land use-related regulations that are applicable to development within the Outer Corridor are addressed in Section IV.H, Land Use, of this EIR. It is noted that night lighting on private property is considered a permitted use within the Outer Corridor, as long as the lighting is low-height, low-illumination security lighting that is similar in color to incandescent light and is shielded and directed onto the site.

[42] *Excerpted from City of Los Angeles, Mulholland Scenic Parkway Specific Plan, May 13, 1992, pages 9 through 15.*

(2) Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines

Design guidelines are set forth in the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines (Design Guidelines).[43] The guidelines provide policies, interpretations, and precedents used by the Design Review Board in implementing the MSPSP. The intent of the Design Guidelines is to provide project applicants, City Planning personnel, and others with guidance in designing projects to be compatible with the scenic parkway. As stated in the Design Guidelines:

> "These guidelines do not create entitlements, nor are they mandatory requirements. They provide direction on how the Mulholland Scenic Parkway can best be preserved while allowing appropriate development, and clarify what can be expected when a project is reviewed by the Design Review Board and the Director. They recognize that individual projects and sites are different and present numerous and different design challenges. The guidelines do not require or expect every project applicant to address all the guidelines. An applicant should address the guidelines that are applicable to the proposed project and site conditions."[44]

The Design Guidelines include recommendations for site planning, architecture, landscaping, utilities, and utility-related structures. Each of these issues is addressed in terms of established goals, related objectives, and specific guidelines that implement each objective. The provisions within the Design Guidelines that are most relevant to this analysis of aesthetics, views, light, and glare are listed and assessed below in the Environmental Impacts section (Table IV.A-1). Additional guidelines applicable to the project are addressed in Section IV.H, Land Use.

In the design review process, the Design Review Board applies the standards and criteria in the Specific Plan to ensure that all proposed projects within the Parkway preserve the natural environment and terrain of the Santa Monica Mountains, protect the hillside character of the Parkway, are compatible with the Parkway environment, and do not obstruct views from Mulholland Drive. The Design Guidelines state that a project will be approved by the Director once it has been found to complement the view from Mulholland Drive. In order to be complementary, the project "should not block any scenic view, should be completely screened with native vegetation, and the architecture should be designed to fit and blend into the site."

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[43] *Ordinance No. 167, 943, approved by the City Planning Commission May 22, 2003.*

[44] *City of Los Angeles, Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines, May 22, 2003, page 4.*

(3) Los Angeles Municipal Code

The project site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside). The existing school uses are permitted and operated on the site pursuant to a CU approved in 1965 by the City of Los Angeles Planning Commission. As the project site is located in a residential hillside zone, the project would be subject to a 36-foot maximum height limit pursuant to Los Angeles Municipal Code (LAMC) §12.21A 17(c). As it pertains to this analysis, additional Municipal Code requirements regulate such aspects of development as the design of parking facilities, fences and walls, and oak tree relocation/replacement. Code requirements relating to land use controls are discussed in Section IV.H, Land Use.

LAMC §16.50 outlines procedures for obtaining approval of the Design Review Board.[45] In order to obtain approval, the Design Review Board must hold a public meeting and notify owners and occupants adjacent to the subject property. Within five calendar days after it has acted on the application, the Design Review Board must submit its recommendation to the Director of City Planning. As stated above, the Design Review Board plays an advisory role with respect to conditional uses and associated approvals by the City Planning Commission. The Design Review Board, however, cannot amend any previously approved discretionary actions.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The evaluation of aesthetic impacts is based upon the potential for the project to result in changes to the site's aesthetic character and the relationship of these changes to the surrounding environment. The visual character of the surrounding area was identified through field surveys, photographic interpretation, topographic analysis, and analysis of historic development patterns. In addition, the project was evaluated relative to the goals, purposes, and polices of the Mulholland Scenic Parkway Specific Plan and the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines.

The evaluation of impacts on views is based upon the project's potential to result in changes to the visual accessibility of unique visual resources within and near the project site, as perceived by the public (e.g., motorists and pedestrians on nearby streets) and private citizens (e.g., residents and property owners in the vicinity). This analysis addresses the degree to which proposed development may obstruct or detract from existing views from representative viewing locations. In general, the views analysis is closely tied to topography and distance from the view

[45] *Ordinance No. 171,128, July 21, 1996, amended by Ord. No. 173,268 effective July 1, 2000.*

resource. The identification of available views within the project site and surrounding area was accomplished through field surveys, photographic documentation, and topographic analysis.

The assessment of potential illumination impacts is based on an evaluation of changes to on-site land uses and nighttime lighting sources and the resulting effects on identified sensitive receptors. A qualitative analysis of the potential for an increase in ambient light levels and light spillover onto off-site light-sensitive uses was conducted. Nearby sensitive receptors were identified through review of the aerial photograph and during a survey of the area.

The evaluation of existing glare conditions associated with the project site includes visual observations of the site. The potential for substantial changes to existing glare generation from future development of the site was then evaluated. Nearby receptors sensitive to glare exposure were identified through a windshield survey of the area and review of the aerial photograph.

b. Threshold of Significance

(1) Aesthetics

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide" for consideration on a case-by-case basis in making a determination of significance:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community or localized area, which would be removed, altered, or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

Based on these factors, a project would have a significant impact on aesthetics if:

- The project would substantially and permanently detract from the valued visual character of a community, neighborhood or localized area by conversion of large areas of visible natural open space.
- The project introduces inappropriate contrast between proposed project elements and existing features that embody the area's valued aesthetic image.
- Existing features or elements (such as structures, public plazas, art or gardens) that substantially contribute to the valued visual character or image of an area are removed or altered in significant part by the project.
- The project represents substantial inconsistencies with goals and policies of the Community Plan applicable to local aesthetics.

(2) Views

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis in making a determination of significance:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

Based on these factors, a project would have a significant impact on views if:

- The project would substantially obstruct views available from a designated scenic highway, corridor or parkway, or would substantially obstruct recognized or valued views currently enjoyed from a public roadway, bike path, trail or private property vantages.

(3) Light and Glare

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis in making a determination of significance:

- The change in ambient illumination levels as a result of project sources; and
- The extent to which project lighting would spill off the project site and affect adjacent light-sensitive areas.

Based on these factors, a project would have a significant illumination impact if:

- The project introduces new sources of light that would substantially affect nighttime views or substantially illuminate adjacent, off-site, light-sensitive uses.
- The project would include highly reflective surfaces that produce intense glare onto adjacent glare-sensitive uses.

c. Project Features

As discussed in more detail in Section II, Project Description, of this EIR, the project proposes to remove approximately 26,350 square feet of existing building area at The Buckley School campus and construct approximately 69,500 net new square feet, for a total of 168,650 square feet of classroom, specialized instruction, administration, and school-related athletic facilities. The proposed improvements would thus involve the removal of six existing buildings, the construction of five new/replacement buildings, a central plant, addition to one existing building, renovation of several existing buildings, and construction of new athletic facilities and an enclosed parking facility. The new structures would be generally located within the previously developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon and the natural vegetation. Based on the conceptual site plan provided in Figure II-4 in Section II, Project Description, of this EIR, the following summarizes the major building elements proposed as part of the project:

- The new Middle and Upper School Main Academic Center would be located on the site of the existing Middle and Upper School Humanities Buildings, Administration Building, and Library. The new building would be approximately 61,420 square feet in area and would consist of two stories, except for a single-story component in the northwestern portion of the building. The Main Academic Center could potentially consist of a group of visually distinct classroom components that utilize the new enclosed Parking Facility (described below) as a common structural platform. In addition to structural articulation to reduce building massing, the Middle and Upper

School Main Academic Center would be designed with varied rooflines to reduce building heights viewed from the north and west. Much of the most visible façades of the building (i.e., the northern and western sides) would have low- to mid-rise rooflines measuring approximately 31.1 to 43.6 feet above finished grade, with building height increasing to the east. The tallest portion of the Middle and Upper School Main Academic Center would occur on the eastern façade, which would not be visible to neighboring residential properties. Based on the LAMC definition of building height (i.e., relative to existing grade), the building would have a formal maximum height of up to approximately 55 feet.[46] However, given the sloping nature of the site's natural topography as well as grade changes proposed in this area of the campus, the building would visually appear as 31.1 to 43.6 feet in height from most vantages. Additionally, the proposed roofline would not exceed that of the existing Disney Pavilion to the immediate south.

- The new enclosed Parking Facility would be built below the classroom levels of the Main Academic Center and would function as a structural foundation for the classroom levels above. The Parking Facility would include two levels of parking to replace the existing surface parking lot within the northern portion of the campus. The facility would provide approximately 240 parking spaces, in addition to approximately 66 surface parking spaces that would remain throughout the campus. The design of the Parking Facility would also increase the capacity for vehicle queuing on campus. A landscaped island would be provided within the arrival plaza, and the campus entry drive would be heavily landscaped, thereby visually improving the views onto campus from Stansbury Avenue. In addition, a replacement 150 square-foot Guard House located near the main campus entrance would be built. The new Guard House would be approximately 18 feet in height. The existing pole-mounted, changeable message sign located near the campus exit would be removed.

- A new 18,770-square foot Library and Technology Center would be located on the west side of the campus along the proposed central pedestrian walkway. The existing 700-square-foot Milk House and outdoor seating area would be removed to provide space for this new building. With the development at the Milk House site, excavation would be minimized since construction would occur within an existing developed area, and minimal excavation would be required for the basement. The topographic location of this site would also screen the building from homes located above the

[46] *The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

campus on Camino de la Cumbre. The building would be approximately 36 feet in height.

- The Academic Building West would be located south of the arrival plaza and west of the Middle and Upper School Main Academic Center, adjacent to the central pedestrian walkway. The new two-story building would consist of 5,180 square feet, with a maximum building height of approximately 39 feet.

- Alterations to the existing Academic Building South would involve a two-story addition comprising 7,000 square feet of primarily classroom space. The height of this addition would be similar to that of the existing building, or approximately 36 feet. Interior renovations to existing portions of the building would also occur.

- A new outdoor Aquatic Center would be built in the northern portion of the athletic field area. The Aquatic Center would include approximately 3,330 square feet for lockers, restrooms, a training room and office, and storage. This structure would have a maximum height of 33 feet. The Aquatic Center would likely be built entirely on the existing Buckley campus, but may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future negotiations with SMMC. Placement of the Aquatic Center utilizing a portion of the existing encroachment on SMMC land would limit views of the facility from the north, south, and west.

- The existing drive that traverses the campus would become a pedestrian-oriented walkway designed and landscaped to be aesthetically compatible with The Buckley School's canyon setting. This central pedestrian walkway would be maintained as a 20-foot clear Fire Department emergency access route at all times.

- Interior renovations of the Disney Pavilion and Lower School would also occur as part of the project. Upon completion of the Aquatic Center, the existing indoor pool in the Disney Pavilion would be converted to school uses. Lower School improvements would likely include interior renovations in certain rooms, improvements within the kindergarten lunch area, and painting of building façades to create visual consistency throughout the campus. In addition, the Lower School mechanical systems would be physically connected to the new Central Plant. No new building area is proposed as part of the renovation activities.

- A basketball court would be introduced in an area southwest of the existing Academic Building South, currently used for surface parking and trash compaction. Striping for a court at this location would make use of an existing, relatively flat and paved area in order to limit the need for clearing and grading. The basketball court would have perimeter chain link fencing of approximately 12 to 14 feet in height. As described further below, perimeter screening in the form of native shrubs and vines would be introduced around the proposed basketball court to shield off-site views.

- The proposed Central Plant would be located immediately east of the Middle and Upper School Main Academic Center at the foot of the adjacent slope.[47] The Central Plant would house a cooling tower and two chillers, and most of the campus buildings would have rooftop air handlers that connect to the Central Plant. With a building height of approximately 21 feet, the Central Plant's location would minimize visibility from elsewhere on the campus and would not be visible to the residential properties to the west.

- Modular units would be required for displaced classrooms during construction and are planned to be located on the existing athletic field as well as in a small area immediately north of the Academic Building South, as illustrated in Figure II-5 in Section II, Project Description. One modular unit located next to the Academic Building South would be utilized for food service during construction of Phases 1 and 2; modular units or classroom bungalows with up to 26 classrooms would also be located on Gilley Field, with additional modular units for offices and restrooms, during the construction of Phase 2. Collectively, the modular units would cover an area of approximately 1,300 square feet within the Main Academic Campus and approximately 34,000 square feet on Gilley Field. The classroom facilities would be used for Middle and Upper School classes for approximately 18 months during construction of Phase 2 (primarily during the 2010–2011 school year). Following their temporary use, the bungalows would be removed and the playing field restored.

As discussed previously, the project would be subject to a 36-foot maximum height limit due to the site's hillside zoning designation. One existing structure and two of the proposed buildings described above would exceed this height limit.[48] As such, the project proposes a modification of the height regulations pursuant to LAMC §12.24F (discussed further in Section IV.H, Land Use) to allow some building heights up to a maximum of 55 feet.[49] The Middle and Upper School Main Academic Center would measure up to 55 feet in height from existing grade based on the LAMC definition of building height, but would visually appear no greater than 43.6

[47] *Per LAMC §12.22, rooms housing building operating equipment or machinery are excepted from the definition of floor area. Accordingly, the proposed Central Plant is not included in the project floor area totals.*

[48] *It is noted that two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

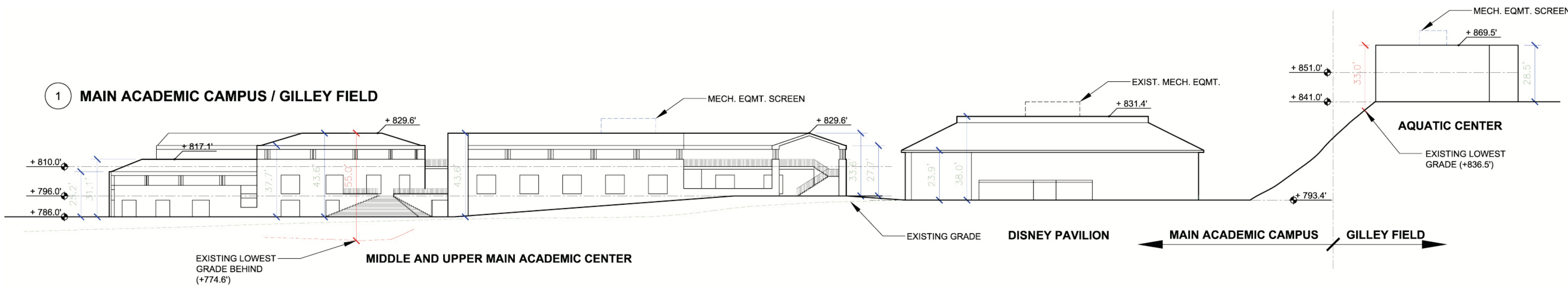
[49] *The existing Disney Pavilion is 38 feet high and would remain as part of the project. While a building height of 38 feet exceeds the hillside zoning height limit, it is consistent with Section 6D of the MSPSP.*

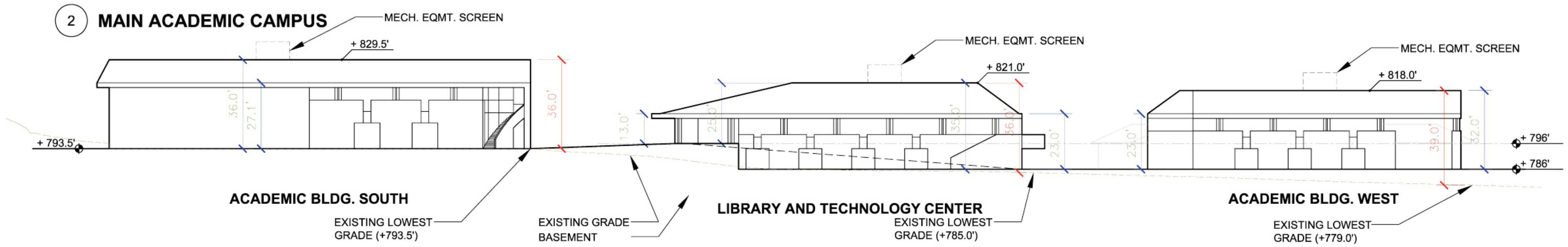
feet in height due to the sloping nature of the site's topography and grade changes proposed as part of the project.[50] A building height of up to 55 feet and the proposed changes in finished grade for this new building would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. Additionally, the Academic Building West would have a maximum building height of 39 feet. All other proposed buildings would fall within the 36-foot height limit specified by the hillside requirements. In any event, all of the new structures would have heights that are generally similar to existing building heights on-site, and no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[51] Please refer to Figure IV.A-7 on page 105 for an illustration of proposed building elevations. The figure also highlights some of the proposed grade changes surrounding the new structures, thus illustrating the difference between perceived building height (i.e., relative to finished grade) and the LAMC-defined building height (i.e., relative to existing grade).

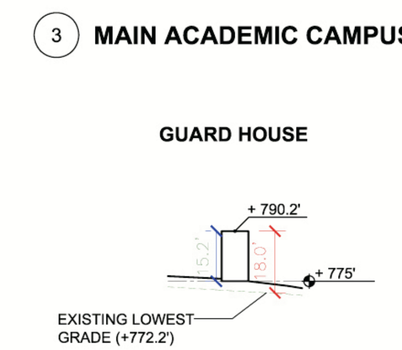
The design of the project is intended to create a unique and unified campus community, emphasizing the reuse of existing developed areas and the integration of new construction with existing topography, vegetation, and structures. Building materials would include stucco plaster façades with windows in aluminum frames, trellises, and roof tiles matching the existing Spanish-style tiles. The proposed structures would feature clean lines and an architectural simplicity based on the architectural vocabulary of the existing campus, thus acknowledging the history of the campus while building on it for the future. Landscaped courtyards, walkways, and/or patios would be introduced around the perimeter of most buildings and would include trees, seasonal gardens, or perimeter hedges. Any new fencing used within the site interior

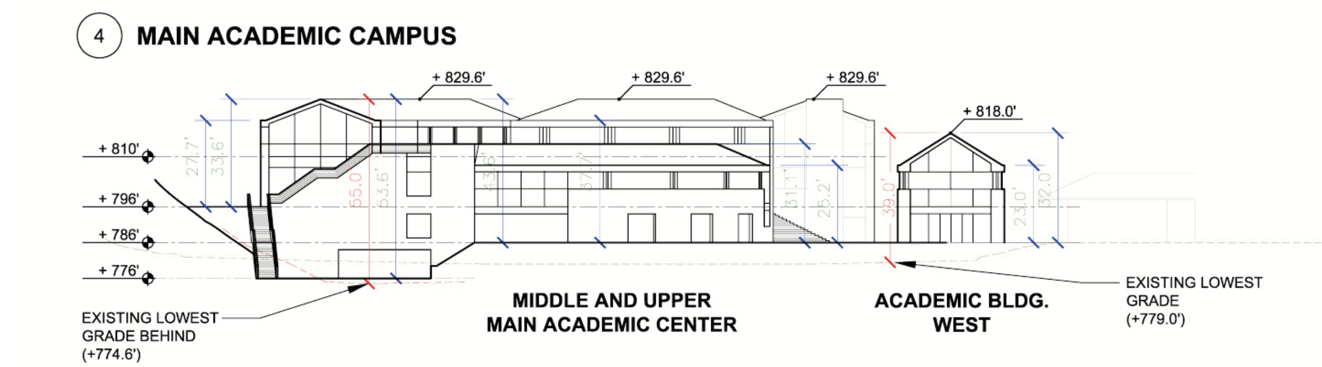
[50] *Per LAMC §12.03, building height is defined as "the vertical distance above grade measured to the highest point of the roof, structure, or the parapet wall, whichever is highest. Retaining walls shall not be used for the purpose of raising the effective elevation of the finished grade for purposes of measuring the height of a building or structure." Also per LAMC §12.03, grade or adjacent ground level is defined as "the lowest point of elevation of the finished surface of the ground, paving or sidewalk within the area between the building and the property line, or when the property line is more than 5 feet from the building, between the building and a line 5 feet from the building." The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

[51] *Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*







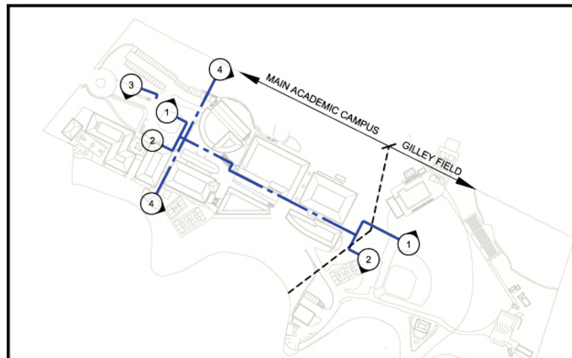


EXISTING GRADE   LAMC HEIGHT

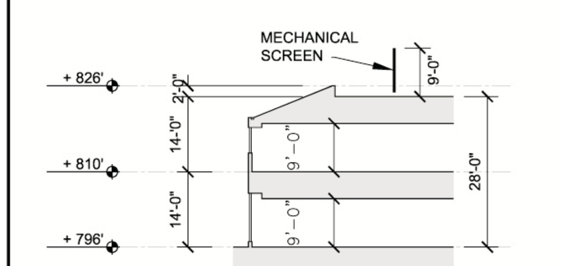
CAMPUS ENHANCEMENT PLAN
THE BUCKLEY SCHOOL

BUILDING ELEVATIONS

JUNE, 2006



KEY PLAN



TYPICAL SECTION ABOVE PARKING
NOTE: MECHANICAL EQUIPMENT SCREEN IS 7' ABOVE THE PARAPET

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Figure IV.A-7
Cross Section Drawings of Project Development

Source: Jeffrey M. Kalban & Associates, 2006.

would be constructed of masonry concrete block with a stucco finish, black or dark green chain link, wrought iron and/or additional materials permitted by the Mulholland Scenic Parkway Specific Plan.[52]

Exterior lighting would consist primarily of low-level visibility and security light fixtures for pedestrian and vehicular circulation and parking. Nighttime lighting for the athletic fields, outdoor play courts, and the Aquatic Center would be prohibited except as required for low level security and exiting purposes. Please refer to Figure IV.A-8 on page 107 for illustrative renderings of project development. As shown in the renderings, many of the proposed buildings would appear shorter (i.e., relative to finished grade) than their maximum building height, which is based on existing grade.

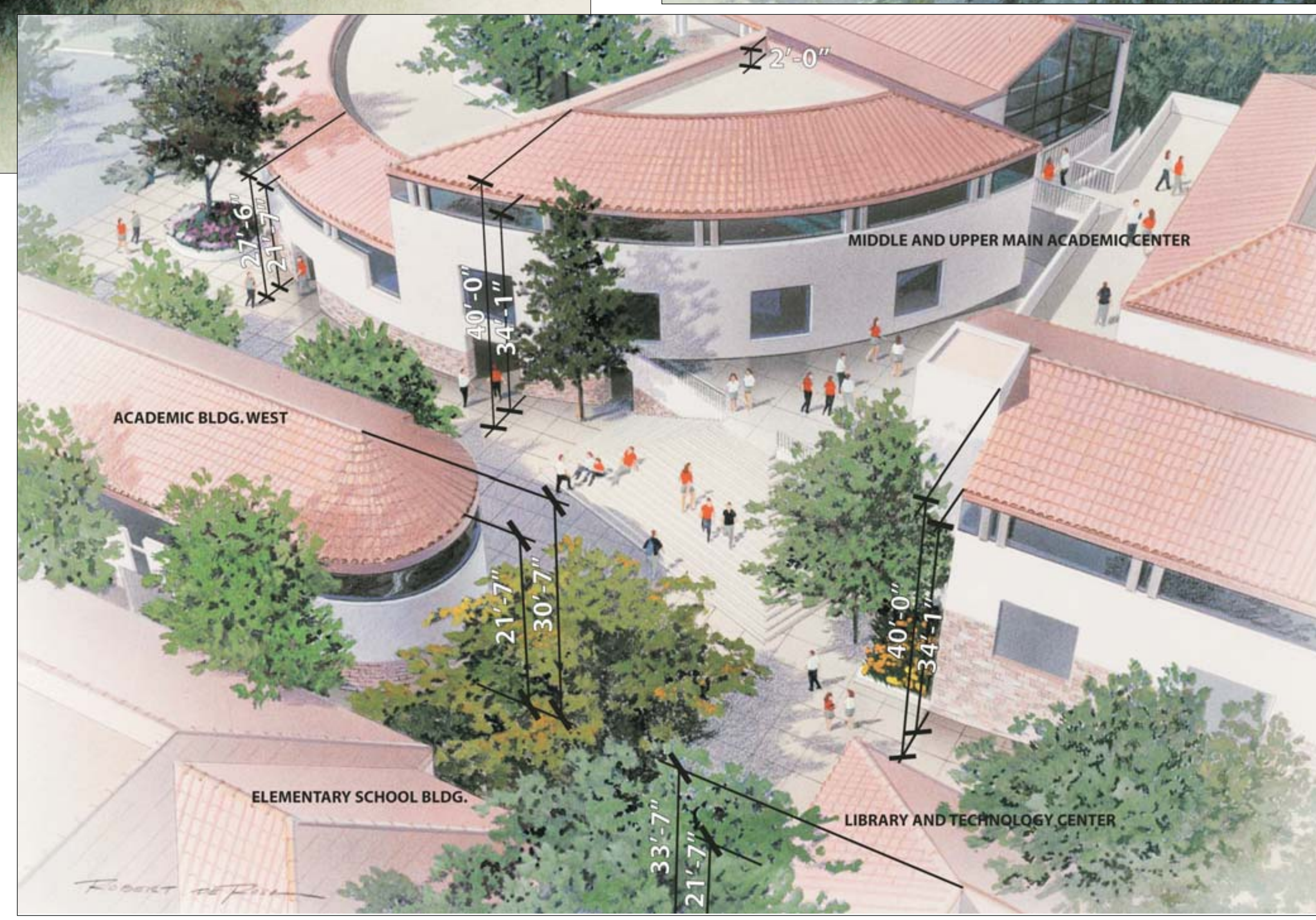
The proposed project also includes a landscape plan, illustrated in Figure IV.A-9 on page 108, designed to buffer campus development from the surrounding residences, promote a green campus complementary to the canyon, and enhance appreciation for the natural setting of the campus. The landscape plan provides for visual screening from adjacent residences and specifies plant materials and plant locations. As shown in Figure IV.A-9, the landscape plan provides for coast live oak, California sycamore, crape myrtle, sweetgum, toyon, Arbutus 'Marina' and other native shrubs and vines throughout the campus. In compliance with the MSPSP, proposed landscaping would consist primarily of native fire-resistant plants and would not include any of the prohibited plant materials specified in the plan.[53] Particular attention would be paid to the areas affected by project development, and the edges of construction would be replanted to blend with the adjacent landscape. As mentioned above, landscaped courtyards, walkways, and/or patios with trees, seasonal gardens, or perimeter hedges would be introduced around the perimeter of most buildings. For example, rows of trees would be introduced alongside several new and existing buildings. Other hardscaped areas on-site would include trees and plants where possible. A planted grove comprised largely of sycamore trees would be introduced along the main entrance driveway, providing a transition from the mature trees on Stansbury Avenue to the new landscaping on campus, with a residential landscape oasis (i.e., plants of the type and scale occurring throughout the neighborhood) occupying the center of the arrival plaza. Additionally, the existing turtle pond would likely be recreated near its current location. Landscaping would also be added to "green" the southern portion of the campus and obscure off-site views of some of the existing small storage buildings. Furthermore, perimeter screening in the form of native shrubs and vines would be introduced around the proposed basketball court, the Aquatic Center, and the adjacent existing basketball and weight facility. Overall, while project implementation would slightly decrease the amount of landscaped area within the campus, the proposed

[52] *The existing fencing around portions of the site perimeter, including along Camino de la Cumbre, would remain in place.*

[53] *Refer to Mulholland Scenic Parkway Specific Plan, Section 10.B.*

Developed Campus

Arrival Plaza



Middle and Upper School
Main Academic Center

Note: The indicated building heights represent height from finished grade (i.e., perceived height), not LAMC-defined height

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Figure IV.A-8
Illustrative Renderings of Project Development

Source: Source: Jeffrey M. Kalban & Associates Architecture, Inc. 2006

NATIVE TREE REMOVAL

NUMBER OF NEW NATIVE TREES REQUIRED TO MITIGATE NATIVE TREE REMOVAL: 36

NUMBER OF NEW NATIVE TREES ON PLAN: 90

PRELIMINARY IRRIGATION NOTES

1. ALL LANDSCAPE AREAS WILL HAVE NEW PERMANENT IRRIGATION SYSTEMS INSTALLED.
2. THESE SYSTEMS WILL BE ZONED TO TAKE INTO ACCOUNT PREVAILING WINDS, SOLAR EXPOSURE, THE TYPE OF PLANTS TO BE IRRIGATED, AND THE EQUIPMENT BEING USED.
3. ALL SYSTEMS WILL BE AUTOMATICALLY CONTROLLED AND WILL INCLUDE A RAIN SENSING SHUT OFF DEVICE.
4. THE IRRIGATION SYSTEM WILL HAVE A FLOW SENSOR AND MASTER VALVE TO DETECT AND CONTROL BREAKS IN MAIN AND LATERAL LINES, OR DAMAGE TO EQUIPMENT AND ASSEMBLIES.
5. POP-UP TYPE SPRINKLER BODIES WILL BE USED THROUGHOUT, WITH LOW PRECIPITATION RATE FAN SPRAY OR BUBBLER NOZZLES AS APPROPRIATE.
6. THE IRRIGATION SYSTEM DESIGN WILL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES LANDSCAPE ORDINANCE, WATER MANAGEMENT POINT SYSTEM.

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0 100 200 400 Feet

Source: Land Images Landscape Architecture, 2006.

Figure IV.A-9
Conceptual Landscape Plan

landscape plan would increase the number of trees and plants on-site. In addition, the School is evaluating the feasibility of introducing artificial turf within the athletic field area. Artificial field surfaces appear similar to natural grass and maintain an evergreen appearance throughout the year due to the need for minimal maintenance.

The School is also evaluating the feasibility of including solar roofing materials on the roofs of some of the buildings within the campus. Photovoltaic materials could be integrated with the building design to generate a clean, renewable source of solar electrical power. If implemented, solar roofing membranes could be placed on flat portions of the roofs of the Middle and Upper School Main Academic Center, Disney Pavilion, Academic Building South, and some of the Lower School buildings. Two-foot mansards with earth-tone roof tiles would line the perimeter of these structures, partially shielding views from off-site. From a distance, the solar roofing would appear as dark striping on portions of the roofs.

As discussed in Section IV.H, Land Use, of this EIR, the project would include a parcel map to create two legal lots, such that Parcel 1 would generally encompass campus property outside of the Mulholland Scenic Parkway Specific Plan Outer Corridor (i.e., the northern portion of the campus) and Parcel 2 would generally encompass campus property within the Outer Corridor (i.e., the southern portion of the campus).[54] Illustration of the portion of the project site falling within the Outer Corridor is provided in Figure IV.H-4 in Section IV.H, Land Use. The project would require a Specific Plan Exception for relief from the Mulholland Scenic Parkway Specific Plan to allow facility expansion and operation of an existing school use within the Specific Plan's Outer Corridor, as well as a Specific Plan Exception to allow some buildings heights to exceed the maximum 40 feet allowed within the Outer Corridor. Approval from the Mulholland Scenic Parkway Design Review Board would also be required for the proposed outdoor Aquatic Center to be developed within the MSPSP area.

In addition to the project components summarized above and described in Section II, Project Description, of this EIR, the following project features related to aesthetics and views are proposed as part of the project and supplement the Project Description:

- Any mechanical structures on the roof, such as air conditioning units and other equipment, which may be as much as nine feet in height, would be screened from view of any abutting properties with single family dwellings, to the extent feasible, with materials compatible with the design of the building and shall not count toward building height consistent with §12.21.1 B 3 of the LAMC.

[54] *The proposed lot line would not coincide exactly with the Mulholland Scenic Parkway Specific Plan Outer Corridor boundary.*

- The subject property including any landscaped setbacks adjacent to the exterior walls along all property lines would be maintained in an attractive condition and would be kept free of trash and debris. Trash receptacles would be located throughout the site.

- All trash facilities would be enclosed within solid masonry walls of a minimum of six feet in height. There would be no wall openings except for gates. The area would be buffered so as not to result in noise, odor or debris impacts on any adjacent uses. Recycling bins would be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

- The property owner would maintain the subject property clean and free of debris and rubbish and promptly remove any graffiti from the walls.

- Open areas not used for buildings, driveways, parking areas, recreational facilities or walks would be attractively landscaped and maintained in accordance with landscape plans, including an automatic irrigation plan.

- Nighttime lighting for the athletic field, outdoor courts and Aquatic Center would be prohibited except for low-level security and exit lighting.

- An exterior Illumination Plan would provide for safe visibility along pedestrian routes and vehicular routes, but shall emphasize the use of low intensity, energy efficient illumination sources that minimize off-site visibility, to the extent feasible.

d. Analysis of Project Impacts

(1) Aesthetics

As described above, the analysis of aesthetics addresses four thresholds of significance related to: (1) potential detraction from the visual character of a community by conversion of large areas of visible natural open space; (2) inappropriate contrast between project elements and an area's valued aesthetic image; (3) removal of valued visual elements; or (4) substantial inconsistencies with the goals and policies of the applicable plans.

With regard to the first threshold, the project would not alter the visual character of the community by converting a large area of natural open space. As previously described, proposed construction is designed to make use of previously developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon, the natural vegetation, and existing open space areas. The project would convert one relatively small area of open space located in the northern portion of the athletic field area.[55] However, the vast majority of the athletic field, which constitutes the largest open space area on campus, would remain in place.[56] New development would respect and promote the natural canyon setting of the campus, and the introduction of new landscaping throughout the site would serve to further green the campus. In particular, the tree-lined main driveway, the landscaped areas adjacent to the new buildings, the new turtle pond, and various other landscaped courtyards and walkways throughout the site would improve the visual quality of the developed campus. Similarly, most of the existing parking lot in the northern portion of the site would be converted to a landscaped arrival plaza (with a small visitor parking area), thereby reducing hardscape and visually improving off-site views, while maintaining the openness of this area.

With regard to the second threshold concerning contrast, the project would not create an inappropriate contrast between project elements and the area's valued aesthetic image. Proposed development would be similar in terms of land use and site layout to the existing school campus, and the new building architecture would represent updated designs compatible with the existing building styles. The new buildings would have similar perceived heights (i.e., relative to finished grade) and similar roofline heights as existing development, and the massing of new square footage would be articulated to reduce the massing of structures. In particular, the Middle and Upper School Main Academic Center could potentially consist of a group of visually distinct classroom components that structurally comprise a single building. While the Main Academic Center would have a formal maximum height of up to approximately 55 feet based on the LAMC definition of building height (i.e., relative to existing grade), the building would visually appear as 31.1 to 43.6 feet in height from most vantage points due to the sloping nature of the site's natural topography as well as grade changes proposed in this area of the campus. Additionally, the proposed roofline would not exceed that of the existing Disney Pavilion to the immediate south.[57]

Further, the project includes many design features that would minimize potential impacts on the aesthetic character of the area. As described above, the design of the project promotes the

[55] *The Aquatic Center is proposed for location in the northern portion of the athletic field. There is a possibility that the Aquatic Center could be built in the location of the current outdoor basketball and weight facility, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future negotiations with SMMC. If this were to occur, the basketball court and weight facility would be relocated to the area proposed for the Aquatic Center, thus impacts on this geographic area would be the same regardless of which location the Aquatic Center is developed.*

[56] *As discussed below, a portion of the athletic field would be occupied by modular classrooms during construction of Phase 2 (primarily during the 2010–2011 school year); however, the athletic field would be restored following construction and would remain as recreational open space.*

[57] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations.*

reuse of existing developed areas and the integration of new construction with existing topography, vegetation, and structures. Proposed building design would build upon the architectural elements of the original campus, and landscaping and other green and natural features would be introduced.[58] The end result would be a visually unified campus that harmonizes structures and landscaping with the natural landforms of the canyon. In addition, project elements such as mechanical equipment and trash receptacles would be screened from view from off-site areas to the extent feasible. Furthermore, as discussed further below, none of the proposed improvements would substantially alter or introduce contrasting features within views from Mulholland Drive.

As mentioned above, the School is evaluating the feasibility of including solar roofing materials on the roofs of certain buildings within the campus. If implemented, solar roofing membranes consisting of photovoltaic cells could be placed on flat portions of the roofs of the Middle and Upper School Main Academic Center, Disney Pavilion, Academic Building West, and some of the Lower School buildings. Two-foot mansards with earth-tone roof tiles would line the perimeter of these structures, partially shielding views from off-site. From a distance, the solar roofing would appear as dark striping on portions of the roofs. While the introduction of dark roofing materials would represent a change from the light-colored roofs that currently exist, such materials would not introduce an inappropriate contrast between project elements and the area's valued aesthetic image.[59]

With regard to the third threshold concerning valued visual elements, the only notable features that contribute positively to the character of the campus are the Bell Tower at the Lower School and the turtle pond. The former would remain in place and the latter would likely be recreated near its current location as part of the project. Additionally, the existing pole-mounted, changeable message sign located near the campus exit would be removed, which would be considered a beneficial impact relative to the visual character of the campus.

With regard to construction activities, the short-term changes in existing on-site structures and exterior areas would result in a noticeable change in the site's appearance. Visible construction activities would include the removal of existing structures, site preparation and grading, construction of new structures, and installation of new utilities, amenities, and landscaping. During these activities, equipment and materials may be stored on-site, and temporary facilities, such as portable toilets and construction offices, may be used on-site. The

[58] *In the event that artificial turf is introduced within the athletic field area, the field would maintain a generally natural grassy appearance, with little change throughout the year due to the need for minimal maintenance.*

[59] *This statement is supported by the fact that the MSPSP specifically allows rooftop solar energy devices within the Inner Corridor, including on roofs visible from Mulholland Drive. There are no restrictions on visible rooftop equipment within the Outer Corridor, in which the project site is located.*

most noticeable visual change would be the temporary bungalows planned within the area of the existing baseball diamond. As previously described, modular units would be used for classrooms, faculty/staff offices and facilities, and restrooms for approximately 18 months during construction of Phase 2 (primarily during the 2010–2011 school year). While the design and layout of these facilities would strive to simulate a campus environment for students, the bungalows would not embody the same caliber of building materials as the proposed permanent structures on the site, nor would the bungalows be fully integrated visually with existing campus development and the surrounding canyon. Following their temporary use, the bungalows would be removed and the playing field restored. Thus, proposed construction activities may result in a temporary aesthetic impact to nearby uses, particularly the residences to the west. As discussed in Section II, Project Description, construction activities planned throughout the site would not occur simultaneously. In addition, existing views from the residential areas to the west would remain screened in part by the existing topography and vegetation. Overall, clear, unobstructed views of construction activities would not be available from most off-site vantage points except at a distance, though areas to the immediate west would have the most direct views during various phases of construction.

The evaluation of aesthetics is inherently influenced by a degree of subjectivity, as individuals respond differently to changes in the visual environment. For example, an adverse visual scene to one person may represent an improved visual condition to another. However, to be conservative, it has been assumed that the temporary classroom bungalow area, while temporary, would pose substantial visual discord with the surrounding environment and thus would result in a significant aesthetic impact during construction.

For an analysis of the project relative to applicable goals and policies, please refer to the discussion of regulatory consistency provided further below (subsection 2.d.(4)), which indicates that impacts associated with the consistency of the project with relevant goals and policies regarding aesthetics would be less than significant.

Based on the above, project design would not conflict with or exceed the significance thresholds specified for aesthetic impacts. As such, the impact of the project itself (i.e., post-project conditions) on aesthetics would be less than significant. However, construction activities associated with project implementation would result in a temporary significant aesthetic impact.

(2) Views

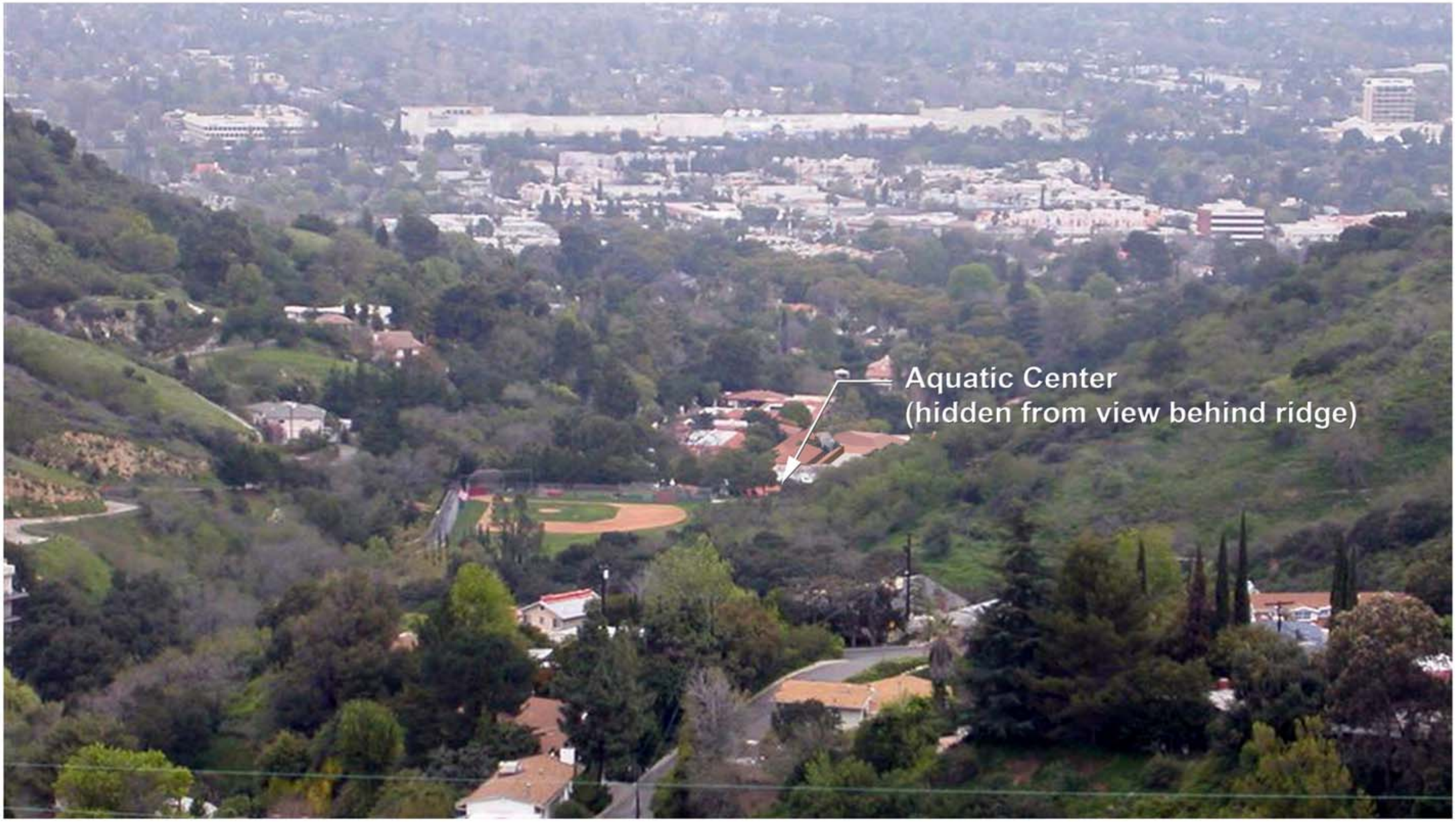
(a) Views from Mulholland Drive

As described above, distant views of and across the project site from Mulholland Drive are available from much of the street segment between Beverly Glen and Nicada Drive. As shown in Photographs 1 and 2 in Figure IV.A-4, the baseball diamond within the athletic field in the southern portion of the campus is the most prominent site feature, and the school buildings appear small and unobtrusive, situated among trees and landscaping. Given the location of the project site within relatively level portions of the lower area of a canyon and the site's distance from Mulholland Drive, campus development does not obstruct views of the valley beyond or the mountains in the distance.

Under the project, the vast majority of proposed development would occur within the existing developed portions of the campus (northern part of campus), and additional buildings would not be introduced within the central, open, undeveloped areas of the athletic field. Thus, in general, the project would blend into the existing campus setting. Additionally, since proposed development would have similar building heights (in terms of rooflines), building scale, and architectural elements (e.g., courtyards and roof materials) as existing structures on-site and since additional landscaping would be provided throughout the campus, views of the site from a distance would not appear noticeably altered. As described above, while the Main Academic Center would have a formal maximum height of up to approximately 55 feet based on the LAMC definition of building height (i.e., relative to existing grade), the building would visually appear as 31.1 to 43.6 feet in height from most vantage points due to the sloping nature of the site's natural topography as well as grade changes proposed in this area of the campus. Additionally, the proposed roofline would not exceed that of the existing Disney Pavilion to the immediate south. Thus, distant views from Mulholland Drive would not be noticeably altered despite any increase in building height. Refer to Figure IV.A-10 on page 115 for a visual simulation photograph of post-project conditions, as viewed from Mulholland Drive.

Within the southern portion of the campus, a new outdoor Aquatic Center is proposed in the northern portion of the athletic field. These new facilities may be partially visible from certain vantages along Mulholland Drive. However, given the distance of the viewing locations from the site and the topography and vegetation of the adjacent hillside, views would not be substantially altered.[60] In any case, development in this area of the campus would not block views of any valued visual resources. The southern portion of the campus would generally remain open and would continue to be used as an athletic field, and, following project construction, the baseball diamond would remain the most notable visual feature from Mulholland Drive. While the temporary classroom bungalows would also be visible during construction, they would not obstruct recognized or valued views. (Refer also to the regulatory

[60] *There is a possibility that the Aquatic Center could be built in the location of the current outdoor basketball and weight facility, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future negotiations with SMMC. If this were to occur, the basketball court and weight facility would be relocated to the area proposed for the Aquatic Center. Thus, while placement of the Aquatic Center utilizing a portion of the existing encroachment on SMMC land would limit views of the facility from the north, south, and west, view impacts relating to the northern portion of the athletic field would be generally the same regardless of which location the Aquatic Center is developed.*



Simulated view of campus and surroundings from Mulholland Drive west of Beverly Glen Boulevard (near 14405 Mulholland Drive) looking north. This visual simulation corresponds to photograph 1 in Figure IV.A-4.

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Figure IV.A-10
Visual Simulation of Post-Project View from Mulholland Drive

Source: Karsai Associates, 2006.

discussion below for analysis of the project relative to the MSPSP Outer Corridor, in which the southernmost portion of the site is located.)

As discussed above, Mulholland Drive is designated as a Scenic Parkway in the Mulholland Scenic Parkway Specific Plan. The closest major vista points, Stone Canyon Overlook (Nicada Overlook) and Deep Canyon Overlook, offer expansive canyon views. However, as discussed above, due to the topography of the area, these locations do not offer views of the project site. Therefore, project implementation would not affect such vistas.

In summary, the nature and quality of views from Mulholland Drive would not be negatively impacted by the project. No structures would abut or rise above Mulholland Drive, interrupt prominent ridgelines, or block views of other valued visual resources such as the San Fernando Valley and Santa Susana Mountains to the more distant north. As such, implementation of the Campus Enhancement Plan would not substantially obstruct a recognized or valued view currently enjoyed from the scenic corridor, and impacts would be less than significant.

(b) Views from Fossil Ridge Park

As previously described, there are few areas or trails within Fossil Ridge Park that are accessible by foot. While views of the campus are technically available from Fossil Ridge Park, there are few locations that permit such views. The most notable new feature located near the park boundary would be the Aquatic Center within the athletic field area. However, this facility would not substantially obstruct views of valued visual resources. While the temporary classroom bungalows would also be visible during construction, they would not obstruct recognized or valued views.

As discussed above, the majority of project development would occur within the existing developed portions of the campus and would visually blend into the campus setting. New development would have similar building heights (in terms of rooflines), scale, and architectural elements as existing structures, and additional landscaping would be provided. Thus, views of campus development, where available from locations within Fossil Ridge Park, would not change significantly. Furthermore, such views would continue to be intermittent at best due to heavy vegetation throughout the park and would not be substantially affected by project development. Impacts on views from Fossil Ridge Park would be less than significant.

(c) Views from Local Residential Streets

Public and private views of and across the site from portions of Camino de la Cumbre, Camino de Solana, the southern end of Stansbury Avenue, residential streets south of the site such as Coy Drive and Beverly Glen near Mulholland Drive, and homes on Beverly Ridge may be affected by project implementation.

From Camino de la Cumbre and Camino de Solana, views of campus development would be altered, as existing buildings would be removed or expanded and new buildings constructed. Please refer to Photograph 1 in Figure IV.A-11 on page 118 for a visual simulation photo of a post-project view from Camino de Solana. Despite the structural changes, the general site layout would remain intact, and few open or natural areas of the site would be developed with new facilities. The new structures would be integrated with existing buildings and the natural character of the canyon. Proposed development would be similar in terms of building scale and architectural elements to existing structures on-site, and the views of building rooftops would be essentially the same as under existing conditions. As previously described, the Middle and Upper School Main Academic Center would have an increased formal building height compared to existing structures, but the building would visually appear much shorter due to the sloping nature of the site's natural topography and proposed grade changes. As such, the roofline of the Main Academic Center would not exceed that of the existing Disney Pavilion to the immediate south, and the building would be visually compatible in terms of height with surrounding development.

In addition, a substantial amount of existing perimeter landscaping would be retained to provide privacy for neighbors and visual screening for the School. Additionally, the edges of construction would be replanted to blend with the adjacent landscape, and landscaped courtyards, walkways, and/or patios would be introduced around the perimeter of most buildings. Part of the existing parking lot in the northern portion of the site would be converted to a landscaped arrival plaza with a tree lined drive, reducing hardscape and visually improving off-site views while maintaining the openness of this area. Furthermore, removal of the existing pole-mounted changeable sign would be considered a beneficial impact. Overall, existing views of visual resources such as Fossil Ridge Park, the San Fernando Valley and the more distant Santa Susana Mountains from these locations to the west would not be substantially altered.

Views from residences along the eastern side of Beverly Ridge would be similarly affected. With little change in the general site layout and few open or natural areas of the site developed with new facilities, views of building rooftops would be essentially the same as under existing conditions. Additionally, the natural character of the campus's canyon setting would be preserved and enhanced through implementation of the proposed landscape plan. Any changes to views of the athletic field would be similar to those described above for Camino de la Cumbre. In addition, existing views of view resources such as Fossil Ridge Park, the San Fernando Valley and the more distant Santa Susana Mountains from these locations would not be substantially altered. At the northernmost part of campus, the guard house would be replaced and the existing roadway and parking lot would be reconfigured and landscaped. Thus, from Stansbury Avenue,

Photo 1: Simulated panoramic view of campus from 3852 Camino de Solana. This visual simulation corresponds to photograph 4 in Figure IV.A-5.

Photo 2: Simulated view of campus entrance from Stansbury Avenue at Valley Vista Boulevard. This visual simulation corresponds to photograph 5 in Figure IV.A-6

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Figure IV.A-11

Visual Simulations of Post-Project Views

Source: Karsai Associates, 2006.

visual changes would be minimal and ultimately improved due to the introduction of the tree-lined drive and arrival plaza.

The residential neighborhood south of the site, including the southern segment of Camino de la Cumbre, Camino de la Cumbre Place, Coy Drive, Glorietta Drive and Place, and Beverly Glen near Mulholland Drive, would experience limited visual changes. Due to the varied topography of the neighborhood and intervening vegetation within part of Fossil Ridge Park, some street segments and residences have views of the site, while others do not. Any changes in views would be similar to those described for Mulholland Drive due to the distance from the site and the elevation of the neighborhood relative to the campus. New facilities in the southern portion of the campus (e.g., the Aquatic Center) would be the most noticeable visual addition. Overall, existing views of view resources such as Fossil Ridge Park, the San Fernando Valley, and the more distant Santa Susana Mountains from these locations to the south would not be substantially altered.

Based on the above, the nature and quality of views from local residential streets would not change substantially as a result of project implementation. New elements associated with the project would not substantially obstruct any recognized or valued view, and views of the site from a distance, in particular, would not appear noticeably altered. Impacts would be less than significant.

(3) Light and Glare

Implementation of the proposed project would not substantially increase ambient light levels on the project site and in the immediately surrounding vicinity. Similar to existing conditions, project-related lighting would consist of low-level point light sources. Nighttime exterior lighting would consist primarily of visibility and security light fixtures for pedestrian and vehicular circulation and parking. Such fixtures would continue to be directed inwards and downward with shielding as appropriate, in order to minimize light spillover. Existing and proposed landscaping on-site would also serve to limit the visibility of campus lighting from off-site. In addition, other than low-level security and exit lighting, the athletic field and recreational amenities in southern portion of the project site would not be lit. Thus, the project would not introduce new sources of light that would substantially affect nighttime views or substantially illuminate adjacent, off-site, light-sensitive uses, and impacts associated lighting would be less than significant.

Glare effects also would not be expected to increase under the project. With removal of the main northern surface parking lot and introduction of enclosed structured parking, glare reflected from parked vehicles on-site would be reduced. As metal roofing, highly reflective glass materials, and reflective glazing would not be introduced on-site, sunlight reflected from project building windows would not be expected to generate substantial glare during most of the year, similar to existing conditions. Additionally, the proposed building façade materials, including concrete masonry units and plaster façades with clear and colored glazing, would generally be non-reflective. The only notable new source of glare would be the proposed swimming pool surface; however, its location behind the associated Aquatic Center building along with proposed perimeter landscape screening would shield most off-site sensitive uses from this glare. Since the project would not include highly reflective surfaces that produce intense glare onto adjacent glare-sensitive uses, glare impacts would be less than significant.

(4) Regulatory Consistency

The proposed project would be generally consistent with applicable requirements set forth by the Mulholland Scenic Parkway Specific Plan, the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines, and the Los Angeles Municipal Code. As previously mentioned, the project would require a Specific Plan Exception for relief from the MSPSP Section 6A to allow the proposed expansion and operation of school facilities for an existing legal non-conforming school (institutional) use within the Outer Corridor, as well as a Specific Plan Exception for relief from the MSPSP Section 6D to allow one new building to exceed the maximum 40 feet allowed within the Outer Corridor. The project also proposes a modification of the height regulations pursuant to LAMC §12.24F (discussed further in Section IV.H, Land Use) to allow some building heights to exceed the maximum 36 feet permitted in a residential hillside zone. Approval from the Mulholland Scenic Parkway Design Review Board would also be required for the proposed outdoor Aquatic Center to be developed within the MSPSP area.

(a) Mulholland Scenic Parkway Specific Plan

With regard to the significance threshold concerning consistency with applicable goals and policies, the proposed project would be consistent with those standards that affect site appearance as implemented through the Mulholland Scenic Parkway Specific Plan. Based on the following and with approval of the requested Specific Plan Exceptions, the project would be in accord with requirements regarding ridge protection, grading restrictions, oak tree removal, and permitted building heights:

- Project development would occur within the base of the canyon and would not affect ridge areas. No construction or grading on a ridge, or specifically a prominent ridge, would occur.

- No buildings or structures would be constructed on the top of or within 50 vertical feet of the top of a prominent ridge. The project site is sufficiently distant from and at a lower elevation than Mulholland Drive and would not penetrate any viewshed from Mulholland Drive.

- Project implementation would necessitate the removal of approximately 57 trees, including 18 native trees (four coast live oak and 14 southern California black walnut). In accordance with the MSPSP, written approval for oak tree removal would be sought from the City Planning Department. Additionally, in compliance with the City's Protected Tree Ordinance, all regulated trees to be removed would be replaced on at least a two-to-one basis. Refer to Section IV.C, Biological Resources, for further discussion.

- The project would not involve grading in excess of two cubic yards per four square feet of lot area per lot visible from Mulholland Drive. Refer to Section IV.H, Land Use, for further discussion.

- The necessary findings would be sought to permit project grading within 100 feet of a stream bank, development within 200 feet of public parkland, and oak tree removal in accordance with the Mulholland Scenic Parkway Specific Plan. Refer to Section IV.H, Land Use, for further discussion of these approvals and the required findings.

- Proposed building heights would range from approximately 18 feet up to a maximum of 55 feet. As such, the project would require approval of a Specific Plan Exception to allow one new building to exceed the maximum 40 feet allowed within the Outer Corridor. However, the vast majority of new structures would have heights that are similar to existing building heights on-site. Additionally, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[61]

- Exterior lighting would consist primarily of low-level visibility and security light fixtures for pedestrian and vehicular circulation and parking. Lighting would generally be low to the ground, shielded, and directed onto the site. Nighttime lighting for use of the athletic field and outdoor basketball/play courts would not be introduced, except as required for low-level security and exiting purposes.

The Specific Plan Exception for relief from the MSPSP to allow facility expansion and operation of an existing school use within the Outer Corridor would allow construction of the project. Insofar as school facilities currently exist within the Outer Corridor, the project would not represent a change in conditions. As discussed above, the proposed landscape plan would also comply with the MSPSP, consisting primarily of native fire-resistant plants, and would not include any of the prohibited plant materials specified in the plan.[62] Additionally, the project

[61] *Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

[62] *Refer to Mulholland Scenic Parkway Specific Plan, Section 10.B.*

would undergo advisory design review by the Mulholland Scenic Parkway Design Review Board.

In light of the analysis above and with approval of the Specific Plan Exceptions, the project would be considered consistent with the Mulholland Scenic Parkway Specific Plan. The project would not present substantial inconsistencies with goals and policies of the Community Plan applicable to local aesthetics, and impacts would be less than significant. Please refer to Section IV.H, Land Use, for discussion of additional MSPSP goals and policies.

(b) Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines

An analysis of project consistency with applicable guidelines within the Design Guidelines is provided in Table IV.A-1 on page 123. Additional guidelines applicable to the project are addressed in Section IV.H, Land Use. Based on the analysis provided in Table IV.A-1 below, the project would be considered consistent with the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines. Impacts would be less than significant.

(c) Los Angeles Municipal Code

The proposed improvements would be designed and developed in accordance with LAMC requirements and would be subject to review and approval by and necessary permits from various City departments. As previously mentioned, the project proposes a modification of the height regulations pursuant to LAMC §12.24F (discussed further in Section IV.H, Land Use) to allow two buildings to exceed the maximum 36 feet permitted in a residential hillside zone as established by LAMC §12.21A 17(c). In essence, two proposed buildings, the Middle and Upper School Main Academic Center (maximum 55-foot height) and the Academic Building West (maximum 39-foot height), would exceed this height limit.[63] However, the Main Academic Center would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project. Similarly, the Academic Building West would visually appear no greater than 32 feet as measured from finished grade. All other proposed buildings would fall

[63] *In addition, two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

Table IV.A-1

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 6 Site fencing	Fences and walls should not obstruct the right-of-way of Mulholland Drive or the views from Mulholland Drive. Where site fencing or gates are proposed, rough-cut unfinished wood, native-type stone, stained concrete, split face concrete block, textured plaster surface walls, black or dark green chain link or wrought iron, or a combination thereof should be utilized.	The project site is sufficiently distant from and at a lower elevation than Mulholland Drive and would not obstruct views. Any new fencing introduced within the site interior would be constructed of masonry concrete block with a stucco finish, black or dark green chain link, wrought iron and/or additional materials permitted by the MSPSP. New wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to eliminate an existing blind curve at the driveway. The existing chain link and barbed wire fencing along the campus perimeter on Camino de la Cumbre was installed prior to approval of the MSPSP and associated Design and Preservation Guidelines, and therefore is considered a legal, non-conforming structure.
Guideline 9 Ridge top construction	Construction and grading on a ridge, whether or not the ridge is designated as a Prominent Ridge, should be avoided.	Project development would occur within the base of the canyon and would not affect ridge areas. No construction or grading on a ridge would occur.
Guideline 11 Landform grading	In order to create slopes that reflect as closely as possible the surrounding natural hills, graded hillsides should have a variety of slope ratios, should not exceed a ratio of 2:1, and should transition to the natural slope in a manner that produces a natural appearance. (Excerpt)	New structures would be located within the previously developed areas of the campus in order to minimize the effects on the slopes of the canyon. As discussed in Section IV.E., Geology, the project would not significantly modify the existing topography and the adjacent hillsides. All grading activities would comply with applicable City of Los Angeles grading requirements. Any graded portions of hillsides would not exceed a slope ratio of 2:1.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 12 Trees	Oak trees and other native tree species of the Santa Monica Mountains have special protection under the Specific Plan, and should be preserved.	Project implementation would necessitate the removal of approximately 57 trees, including 18 native trees (four coast live oak and 14 southern California black walnut). In accordance with the MSPSP, approval for oak tree removal would be sought from the City. Additionally, in compliance with the City's Protected Tree Ordinance, all regulated trees to be removed would be replaced on at least a two-to-one basis. Refer to Section IV.C, Biological Resources, for further discussion.
Guideline 17 Visibility study	To determine project visibility from Mulholland Drive, all lines of sight from Mulholland Drive toward the project within a ¾ mile radius of the project should be included in the visibility study. The study should not be limited to an angle of view that is perpendicular to the roadway.	The analysis provided herein addresses project visibility from a variety of viewpoints along Mulholland Drive. A formal visibility study would not be required for the project since the MSPSP specifies such studies for the Inner Corridor, but not the Outer Corridor in which a portion of the project is located.
Guideline 28 Retaining wall height	Except for those required for public street improvements or walls contained within the building structure, retaining walls should not exceed 10 feet in height, as measured from finished grade. Retaining walls which exceed 6'-0" in height, as measured from finished grade, and any stepped retaining walls should be offset by a minimum of 3'-0", measured horizontally. Areas between stepped retaining walls should be fully landscaped in accordance with the landscape guidelines.	Several of the retaining walls that currently exist on-site would remain, and the majority of new retaining walls would consist of actual building or structural walls. A freestanding retaining wall is proposed west of the Library and Technology Center as part of the project. This wall would be designed in accordance with applicable standards. Additional retaining walls of short height (i.e., less than five feet) would be introduced in areas of the site as needed. Such walls would also be designed in accordance with applicable standards.
Guideline 29 Retaining wall materials	Where freestanding site retaining walls are proposed, all visible retaining walls should be stucco coated or constructed of stone, brick or decorative block. Decorative block includes slumpstone, split face, battered and other blocks in earth tone colors other than standard gray block or concrete. Color should match or be compatible with the residence and the site.	A freestanding retaining wall is proposed west of the Library and Technology Center as part of the project. This wall would be designed in accordance with applicable standards. The wall would have a finish compatible with the adjacent Library and Technology Center. Additional retaining walls of short height (i.e., less than five feet) would be introduced in areas of the site as needed. Such walls would also be designed in accordance with applicable standards.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 30 Retaining wall landscaping	Where exposed site or building retaining walls are proposed, the visual impact should be diminished by the use of dense landscaping in accordance with the landscape guidelines contained in Section 4.	A freestanding retaining wall is proposed west of the Library and Technology Center as part of the project. This wall would be designed in accordance with applicable standards. Additional retaining walls of short height (i.e., less than five feet) would be introduced in areas of the site as needed. Such walls would also be designed in accordance with applicable standards. Building façades would be articulated with windows, openings, and/or landscaping.
Guideline 31 Building height	The Specific Plan limits the maximum height of a project that can be approved without an exception to the Specific Plan. Projects that are within these height limits may still be recommended for disapproval if the building height would result in a project that impacts views from Mulholland Drive, or that is incompatible with the parkway environment, including the surrounding neighborhood. It is noted as part of this guideline that projects may be subject to more stringent height limits imposed by the Los Angeles Municipal Code, including the Hillside Ordinance.	As discussed above, one proposed structure, the Middle and Upper School Main Academic Center, would exceed the 40-foot height limit established by the MSPSP, and a Specific Plan Exception would be required. This building height would be necessary to accommodate the project's excavated soils on-site (i.e., existing grade would be raised around the building) in order to nearly eliminate the need for soil export or import and reduce associated impacts. Based on the new finished grade, the building would appear as no more than 43.6 feet in height from most vantage points and, in any case, would not be higher than the adjacent Disney Pavilion roofline. All of the proposed buildings would be generally consistent in terms of perceived height with existing development on-site. As also addressed above, views from Mulholland Drive would not be significantly impacted by the project. The project would also require a modification of the LAMC height regulations (discussed further in Section IV.H, Land Use) to allow some building heights to exceed the 36-foot height limit required for residential areas by the Hillside Ordinance. All but two of the proposed buildings would fall within the 36-foot height limit specified by the hillside requirements.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 32 Massing	The main building should combine three or more building elements, each within its own associated roof form. A building element can be a major horizontal mass, a setback or a projection from the face of the other masses.	Proposed buildings would include three or more building elements that would provide diversity in massing. The project design would reflect architectural elements of the original campus, including landscaped courtyards and walkways, stucco exteriors, and tiled roofs. The Middle and Upper School Main Academic Center in particular would be designed with varied rooflines to reduce building heights.
Guideline 34 Building articulation	Design the exterior surface (building elevations) of any structure to be articulated, presenting a variety of surfaces, textures and angles. Avoid designs that include exterior walls or retaining walls that are characterized by large, flat surfaces. (Excerpt)	Building façades throughout the site would be articulated with windows, textured accents, and a variety of architectural treatments. Landscaped courtyards, walkways, and/or patios would be introduced around the perimeter of most new buildings and would include trees, seasonal gardens, or perimeter hedges. Large expanses of flat, unembellished walls would not occur (except for the Central Plant which would be located immediately east of the Main Academic Center, out of view from vantages to the north, south, and west).
Guideline 35 Roof form	Flat roofs should not be utilized, particularly on downslope lots. Roofs should be designed to follow the predominant slope of the land. Where a flat roof must be proposed, a secondary roof form should also be utilized, covering at least 30 percent of the total roof area and offset a minimum of 4’-0” from the flat portion, measured vertically.	A variety of roof forms would be utilized for the project, including flat roofs and sloping tile mansards, similar to existing campus development.
Guideline 36 Roof material	Where built-up or membrane roof conditions are visible, the roofing system should consist of a gravel (non-granular) surface in an earth tone color, compatible with the overall house color.	In general, the proposed roofs would be earth-toned, with pale flat roofs and sloping Spanish tile mansards, similar to existing campus development. The southernmost proposed structure, the Aquatic Center, would have a flat roof that is white in color, consistent with Title 24 requirements.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 37 Roof-top equipment	The Specific Plan prohibits roof-mounted equipment within the Inner Corridor (with the exception of solar energy devices) on any roof which is visible from Mulholland Drive, and should be avoided for all projects if alternative locations are available. Any permitted roof-mounted equipment should be screened from the view of neighboring properties or higher elevation vantage points.	The project is not located within the Inner Corridor. Nonetheless, most of the campus buildings would have rooftop air handlers that connect to the Central Plant and are appropriately screened from view to the extent feasible. In the event that solar roofing materials are introduced on-site, they would be consistent with this guideline as well. No other rooftop equipment is proposed.
Guideline 38 Exterior colors	Colors for residences, walls, fences, and all other exterior structures should complement or be consistent with the naturally-occurring colors of the Santa Monica Mountains, as shown on the Color Wheel (Appendix A). Visible roof coverings and deck surfaces should consist of non-reflective, earth tone colors.	Building materials would include stucco plaster façades with windows in aluminum frames, trellises, and roof tiles. These materials would generally be non-reflective. Façade colors would include neutral colors, similar to existing structures on-site, with earth-toned tile roofs. Any new fencing used within the site interior would be constructed of masonry concrete block with a stucco finish, black or dark green chain link, wrought iron and/or additional materials permitted by the MSPSP.
Guideline 39 Exterior materials	Emphasize the use of natural materials such as stone and unfinished wood for exterior surfaces wherever possible. Reflective exterior material finishes or glazing should not be utilized.	Building materials would include stucco plaster façades with windows in aluminum frames, trellises, and roof tiles. These materials would generally be non-reflective or treated with a non-reflective coating.
Guideline 40 Exterior lighting	Minimize the visual impact of lighting to preserve the Scenic Parkway's park-like setting, avoid the creation of an urban street environment, and protect the movement of wildlife. Lighting sources should be white light. Direct lighting fixtures downward to illuminate only the project property. Avoid up-lighting into trees, exterior illumination of buildings and structures, and floodlighting. Shield exterior lighting fixtures to screen the light source.	Exterior lighting would consist primarily of low-level visibility and security light fixtures for pedestrian and vehicular circulation and parking. Nighttime lighting for use of the athletic field and outdoor courts would not be introduced, except as required for low-level security and exiting purposes. Existing and proposed landscaping would continue to shield on-site lighting, thereby limiting visibility from Mulholland Drive and precluding any contribution to an urban street environment.
Guideline 41 Skylights	Rooftop skylights visible from Mulholland Drive should not be used.	Skylights are not proposed as part of the project.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 44 Mechanical equipment	Heating, air-conditioning and utility equipment and ducts should be completely concealed within the structure. In addition, any exterior mechanical equipment should be screened with landscaping and/or permanent, solid fencing. The location of all exterior equipment should be shown on the site and landscape plans.	Most of the campus buildings would have rooftop air handlers that connect to the Central Plant and are appropriately screened from view, to the extent feasible, with materials compatible with the design of the buildings. Project site and landscape plans submitted to the City would indicate the location of exterior equipment, as required.
Guideline 45 Pool equipment	Pool equipment should be screened by means of landscaping and/or permanent, solid fencing.	While most pool equipment would be housed within the Aquatic Center structure, any outdoor equipment would be screened with fencing (e.g., concrete block with a stucco finish, black or dark green chain link, wrought iron, etc.) and/or landscaping.
Guideline 46 Trash receptacles	All trash and recycling receptacles should be stored inside the building or within an enclosed structure. Where receptacles are stored in any visible yard area, screening should be provided by means of landscaping and/or permanent, solid fencing. The proposed location should be identified on the site plan.	Trash facilities would be located near the Camino de la Cumbre gate and enclosed within solid masonry walls of a minimum of six feet in height. Small trash and recycling receptacles would be located throughout the site, as appropriate.
Guideline 49 Utility connections	All utility connections, including cable and telephone, should be installed below grade.	As under existing conditions, all new utility connections would be installed underground.
Guideline 51 Height adjacent to neighboring homes	No portion of the proposed project located within 15 feet of the side property line should exceed any portion of an existing main structure on an abutting lot within 15 feet of the property line by more than 10 feet in height.	Given the canyon setting of the project site, residences to the west and south of the project site are located at higher elevations than campus buildings; as such, the residential building rooflines exceed those of the existing and proposed buildings on-site. No proposed buildings on-site would be located within 15 feet of a side property line. The proposed building nearest to any adjacent residence would be the new Guard House, which would be 18 feet in height and would not exceed the height of any off-site abutting main structure.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 52 Modifications to existing structures	When existing structures are to be modified, design the modifications to be compatible with the existing structure(s) on the site and other houses in the neighborhood as to height, massing, size, color and setback.	As discussed in the analysis above, new structures would be integrated with existing development and the natural character of the canyon. The project's design would include some architectural elements of the original campus, including courtyards, stucco exteriors, and some tiled roofs. Additionally, with the proposed changes in finished grade and building articulation, the heights and sizes of new structures would be generally similar to those of existing structures on-site.
Guideline 53 Tree survey	All existing oak trees and other significant native and non-native trees should be identified on the project landscape planting plan.	Landscape planting plans will be submitted to the City for review and will identify all existing oak trees and other significant native and non-native trees as required.
Guideline 54 Protection of native and/or significant trees	Existing native trees and distinctive or significant non-native trees located on the project site should be protected from destruction or damage, to the greatest extent possible. Actual or potential destruction or damage to native trees may be adequate justification for recommending disapproval of a project application.	Project implementation would necessitate the removal of approximately 57 trees, including 18 native trees (four coast live oak and 14 southern California black walnut). In accordance with the MSPSP, written approval for oak tree removal would be sought from the City Planning Department. Additionally, in compliance with the City's Protected Tree Ordinance, all regulated oak trees and other protected native trees to be removed would be replaced on at least a two-to-one basis. Refer to Section IV.C, Biological Resources, for further discussion.
Guideline 55 Replacement of native trees	If the loss of any significant native trees is determined unavoidable, the Specific Plan requires that they be replaced by new trees of the same species at a ratio of two-to-one. Additional replacement trees may be recommended to mitigate the loss of native trees.	Project implementation would necessitate the removal of approximately 57 trees, including 18 native trees (four coast live oak and 14 southern California black walnut). None of these trees occur within the Outer Corridor. In compliance with the City's Protected Tree Ordinance, all regulated oak trees and other protected native trees to be removed would be replaced on at least a two-to-one basis. Refer to Section IV.C, Biological Resources, for further discussion.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 56 Landform planting	Landscape graded slopes to create a visual appearance consistent with the characteristics of the surrounding hillsides, such as described in the Department of City Planning's Landform Grading Manual.	The proposed project includes a landscape plan designed to promote a green campus complementary to the canyon setting. Where appropriate, proposed landscaping would incorporate plants of the type and scale occurring throughout the neighborhood in order to provide a transition from the surrounding residential area to the new landscaping on campus.
Guideline 57 New plants	Emphasize a variety of native or native-type plants in the landscape design for the project (see Appendix B, Preferred Plant List); retain existing native plants whenever and wherever possible.	The proposed landscape plan would consist primarily of native fire-resistant plants and would not include any of the prohibited plant materials specified in the MSPSP. The majority of new plants to be introduced on-site are also included in Appendix B, Preferred Plant List, in the MSPSP Design and Preservation Guidelines. The vast majority of native trees located on-site would be preserved in place, and any oak trees and other protected native trees to be removed would be replaced on at least a two-to-one basis in compliance with the City's Protected Tree Ordinance.
Guideline 58 Plant colors	Plant colors should be consistent with the naturally-occurring colors of the Santa Monica Mountains, as shown on the Color Wheel, Appendix A. Brightly colored flowering plants are not considered acceptable on hillside slopes.	The proposed landscape plan would consist primarily of native fire-resistant plants and would not include any of the prohibited plant materials specified in the MSPSP. Where appropriate, proposed landscaping would incorporate plants of the type and scale occurring throughout the neighborhood in order to provide a transition from the surrounding residential area to the new landscaping on campus. Brightly colored flowering plants are not proposed on any hillsides.
Guideline 59 Landscape arrangement	Informal/natural groupings of trees, shrubs and ground covers should be emphasized and should constitute at least 50% of the landscaping for a project.	Landscaped courtyards, walkways, and/or patios would be introduced around the perimeter of most buildings and would include trees, seasonal gardens, or perimeter hedges. Other hardscaped areas on-site would include native trees and plants where possible. In addition, the project would include a grove of trees along the main campus drive and landscaped areas adjacent to the new buildings.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 60 Prohibited plant material	Existing prohibited plant material, as defined in the Specific Plan, as well as non-preferred plant material (see Appendix C, Non-preferred Plant List) may be requested to be removed and replaced with preferred plant material (see Appendix B, Preferred Plant List).	Project implementation will comply with all actions required by the City.
Guideline 62 Project visibility	Landscaping is not permanent, and changes to the landscaping around a project that is "not visible" may suddenly render it highly visible. Therefore, a project that is screened from view from Mulholland Drive by existing intervening landscaping should still be considered "visible," depending on the type and density of plant material.	Changes in landscaping, including the removal of existing and addition of proposed landscaping, have been taken into account in the views analysis above. Regardless, since proposed development would have similar building heights (in terms of rooflines), building scale, and architectural elements as existing structures and given the distance of the site from Mulholland Drive, views of the campus would not appear noticeably altered.
Guideline 63 Landscape screening	Informal/natural groupings of plant material should be used as screening whenever possible instead of walls or fences. A minimum of 50% of all screening plant material should be evergreen. Landscaping should be used to screen structures, while permitting views out in a "peek-a-boo" fashion.	The proposed landscape plan would consist primarily of native, perennial, and evergreen trees and plants and would not include any of the prohibited plant materials specified in the MSPSP. As shown in Figure IV.A-9 on page 108, rows of trees would be introduced alongside several new and existing buildings, and perimeter screening in the form of native shrubs and vines would be introduced around the proposed basketball court, the Aquatic Center, and the adjacent existing basketball and weight facility.
Guideline 66 Viewshed protection	Landscaping should not penetrate the viewshed from Mulholland Drive. Anticipate the mature height of landscaping to ensure that plants will not grow into the viewshed.	The project site is sufficiently distant from and at a lower elevation than Mulholland Drive and would not penetrate any viewshed.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 67 Existing landscape modifications	When existing landscaping is to be modified, design the modifications to be compatible with both the existing landscaping and with other existing landscaping in the neighborhood.	The project has been designed to be integrated with existing topography and vegetation. New landscaping would consist of existing and supplemental native plants, and the vast majority of native trees located on-site would be preserved in place. Where appropriate, proposed landscaping would also incorporate plants of the type and scale occurring throughout the neighborhood in order to provide a transition from the surrounding residential area to the new landscaping on campus.
Guideline 68 Fencing and walls	Fencing and all walls should be a minimum 75% screened with plant material.	Any new fencing used within the interior of the site would be constructed of masonry concrete block with a stucco finish, black or dark green chain link, wrought iron and/or additional materials permitted by the MSPSP. Such fencing would be appropriately screened, as required. No new permanent fencing or walls are proposed along the site perimeter, except at the campus entry driveways on Stansbury Avenue and Camino de la Cumbre.
Guideline 69 Landscape lighting	Outdoor lighting should be downward-facing and emit low illumination.	Exterior lighting would consist primarily of low-level visibility and security light fixtures for pedestrian and vehicular circulation and parking. Nighttime lighting for use of the athletic field and outdoor courts would not be introduced, except as required for low-level security and exiting purposes. In addition, existing and proposed landscaping would continue to shield on-site lighting from off-site vantages.
Guideline 73	Utility-related structures should be painted to blend with surrounding vegetation in the immediate area.	All new utility connections would be installed underground. The proposed Central Plant would be located immediately east of the Middle and Upper School Main Academic Center at the foot of the adjacent slope; with a building height of approximately 21 feet, the Central Plant's location would minimize visibility from elsewhere on the campus and would not be visible to the residential properties to the west. Most of the campus buildings would have rooftop air handlers that connect to the Central Plant and are appropriately screened from

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
		view. Building materials, including those of utility-related structures, would exhibit neutral colors, similar to existing structures on-site.
Guideline 74	All utility-related structures at one site should be painted the same color or in harmonious colors to match the background and landscaping of the particular site.	Building materials, including those of utility-related structures, would exhibit neutral colors, similar to existing structures on-site.
Guideline 76	Landscaping should be planted so that it screens all at-grade equipment from view.	Any outdoor at-grade equipment would be enclosed within walls or fencing and screened with appropriate landscaping, and thus would not be in view from grade level.
Guideline 79	If retaining walls, fences or integrated color concrete pads are used, they should be painted and landscaped to blend with the surrounding area.	A freestanding retaining wall is proposed west of the Library and Technology Center as part of the project. This wall would have a finish compatible with the adjacent Library and Technology. Additional retaining walls of short height (i.e., less than five feet) would be introduced in areas of the site as needed. Such walls would also be designed in accordance with applicable standards. Any new fencing used within the site interior would be constructed of masonry concrete block with a stucco finish, black or dark green chain link, wrought iron and/or additional materials permitted by the MSPSP. Such fencing would be appropriately screened, as required. New wrought iron gates would also be installed at the Stansbury Avenue and Camino de la Cumbre entrances, as permitted by the MSPSP Design and Preservation Guidelines.

Table IV.A-1 (Continued)

Analysis of Project Consistency with Applicable Guidelines in the Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines [a]

Guideline No. and Title	Guideline Text	Consistency with Guideline
Guideline 81	Landscaping for retaining walls should include recumbent or spreading, low-growing plants that will spread around the top and sides of the wall to soften and eventually cover the whole retaining wall.	A freestanding retaining wall is proposed west of the Library and Technology Center as part of the project. This wall would have a finish compatible with the adjacent Library and Technology Center, in accordance with applicable standards. Additional retaining walls of short height (i.e., less than five feet) would be introduced in areas of the site as needed. Such walls would also be designed in accordance with applicable standards. In any case, landscaped courtyards, walkways, and/or patios would be introduced around the perimeter of most new buildings and would include trees, seasonal gardens, or perimeter hedges. Perimeter screening in the form of native shrubs and vines would be introduced around the proposed basketball court, the Aquatic Center, and the adjacent existing basketball and weight facility.
Guideline 82	Cellular installations or other similar equipment to be placed on buildings should be the same color as the roof or painted to blend in with the building.	Most of the campus buildings would have rooftop air handlers that connect to the Central Plant and are appropriately screened from view to the extent feasible. The feasibility of installing solar roofing materials, which are permitted by the MSPSP Design and Preservation Guidelines, is being studied by the School.
Guideline 83	Risers, telephone boxes, and electrical meter boxes (excluding glass meters) on utility poles should be painted brown to match the pole.	All new utility connections would be installed underground.

[a] *Additional guidelines applicable to the project are addressed in Section IV.H., Land Use, of this EIR.*

Source: Excerpted from City of Los Angeles, Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines, May 22, 2003, pages 5 through 35.

within the 36-foot height limit specified by the hillside requirements. In any case, nearly all of the new structures would have heights that are similar to existing building heights on-site. Furthermore, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[59] Additionally, the project would undergo design review to obtain approval by the Design Review Board.

The proposed project would also be subject to provisions of the City's Protected Tree Ordinance No. 177,404. The potential impact of the project on protected native trees is addressed in Section IV.C, Biological Resources. To the extent that existing native trees influence the aesthetics of the site, it is noted that the proposed project would remove four coast live oaks and 14 southern California black walnut, while many others would be preserved in place. The protected trees to be removed would be replaced on at least a two-to-one basis in accordance with the Protected Tree Ordinance. These new trees would contribute to the aesthetic character of the site, and would blend with other proposed landscaping.

Based on this information and with approval of the height modification, the project would be consistent with the LAMC. The project would not present substantial inconsistencies with regulations applicable to aesthetics, and significant impacts would not occur.

3. CUMULATIVE IMPACTS

None of the related projects are located adjacent to the project site or within the natural canyon in which the campus is situated, as shown in Figure III-1 in Section III, General Description of Environmental Setting, of this EIR. While potential mid- to high-rise structures in the surrounding area may be visible from vantage points within the project site or on adjacent roadways, due to the relatively flat topography of the valley to the north of the site and the urbanized nature of the area, the related projects will not likely be prominent in views from the site or the immediately surrounding area. None of the related projects is expected to appreciably alter the urban character of the area. Additionally, the related projects are located sufficiently distant from the project site so as not to increase ambient light levels in the immediate project area.

[59] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights. Refer to Figure IV.A-7 for an illustration of the proposed building elevations.*

In any case, each related project would be analyzed on a case-by-case basis to determine its impact on aesthetics, views, and light and glare. None of the related projects are situated adjacent to the project site or are visually associated with the campus. Furthermore, the project's impacts on aesthetics, views, and light and glare would be less than significant, with the exception of temporary aesthetic impacts during construction on-site. Overall, development of the related projects in the surrounding area, in combination with the proposed project, would result in a cumulative aesthetic impact on aesthetics and views that is less than significant.

4. MITIGATION MEASURES

As analyzed above, project impacts on aesthetics, views, and light and glare would be less than significant, with the exception of temporary aesthetic impacts during construction. However, the following mitigation measures are proposed to further reduce potential impacts associated with project operations. There are no feasible mitigation measures to substantially reduce the anticipated temporary aesthetic impacts associated with project construction activities.

Mitigation Measure A-1: All open areas not used for buildings, driveways, parking areas, athletic facilities, plazas, walkways, or patios shall be landscaped and maintained to reduce visibility of the project improvements from adjacent residences in accordance with a Landscape Plan to be prepared by a licensed landscape architect to the satisfaction of the City Planning Department. Remaining existing natural landscape areas shall be retained and maintained in accordance with the landscape plan.

Mitigation Measure A-2: Nighttime lighting for use of the athletic field, Aquatic Center, and outdoor courts shall be prohibited, except as required for low level security and exiting purposes.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the project features described above, the proposed project would not result in significant impacts relative to aesthetics, views, light or glare, with the exception of temporary aesthetic impacts during construction. Implementation of Mitigation Measures A-1 through A-2 above would serve to further reduce potential impacts. Construction impacts would be short-term, significant and unavoidable due to the perceived visual discord posed by the temporary classroom bungalows.

1. ENVIRONMENTAL SETTING

This section provides an analysis of the air emissions generated by the construction and operation of the proposed Buckley School Campus Enhancement Plan. The analysis of project-generated air emissions focuses on whether the project would cause an exceedance of an ambient air quality standard or SCAQMD significance threshold. The analysis provided herein also addresses the consistency of the project with the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan and the City of Los Angeles General Plan.

a. Regulatory Framework

A number of statutes, regulations, plans and policies have been adopted, which address air quality concerns. The proposed project site and vicinity are subject to air quality regulations developed and implemented at the federal, State, and local levels. Plans, policies and regulations that are relevant to the proposed project are discussed below.

(1) Authority for Current Air Quality Planning

(a) Federal Clean Air Act

At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of the Federal Clean Air Act (CAA). As discussed below, some portions of the CAA (e.g., certain mobile source requirements and other requirements) are implemented directly by USEPA, while other portions of the CAA (e.g., stationary source requirements) are implemented through delegation of authority to State and local agencies).

The CAA was first enacted in 1955 and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The CAA also mandates that the state submit and implement the State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The City of

Los Angeles is within the South Coast Air Basin (Basin), an area designated a non-attainment area for certain pollutants that are regulated under the CAA.

The 1990 Amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA which relate most to the development of the proposed project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants: (1) ozone (O_3); (2) nitrogen dioxide (NO_2); (3) sulfur dioxide (SO_2); (4) Particulate Matter (PM_{10} and $PM_{2.5}$); (5) carbon monoxide (CO); and (6) lead (Pb). Table IV.B-1 on pages 139 and 140 shows the NAAQS currently in effect for each criteria pollutant. The NAAQS were amended in September 2006 to include an established methodology for calculating $PM_{2.5}$ as well as revoking the annual PM_{10} threshold. The Basin fails to meet federal standards for O_3, PM_{10} and $PM_{2.5}$, and therefore is considered a federal "non-attainment" area for these pollutants. The CAA sets certain deadlines for meeting the NAAQS within the Basin including: (1) 1-hour O_3 by the year 2010; (2) 8-hour O_3 by the year 2021; (3) PM_{10} by the year 2006; and (4) $PM_{2.5}$ by the year 2015. Nonattainment designations are categorized into seven levels of severity: (1) basic; (2) marginal; (3) moderate; (4) serious; (5) severe-15;[65] (6) severe-17; and (7) extreme. Table IV.B-2 on page 141 lists the criteria pollutants and their relative attainment status.

Title II of the CAA pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

The CAA also specifies future dates for achieving compliance with the NAAQS and mandates that states submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate

[65] *The "-15" and "-17" designations reflect the number of years within which attainment must be achieved.*

Table IV.B-1

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standard [a]	National Primary Standard [a]	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone (O_3)	1 hour	0.09 ppm	--	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Motor vehicles.
	8 hour	.070 ppm	0.08 ppm		
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hour	9.0 ppm	9 ppm		
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	--	0.053 ppm	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.25 ppm	--		
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	--	0.03 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	--		
	24 hour	0.04 ppm	0.14 ppm		
Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 $\mu g/m^3$	--	May irritate eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hour	50 $\mu g/m^3$	150 $\mu g/m^3$		
Particulate Matter ($PM_{2.5}$) [b]	Annual Geometric Mean	12 $\mu g/m^3$	15 $\mu g/m^3$	Increases respiratory disease, lung damage, cancer, premature death; reduced visibility; surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO_X, SO_X, organics).
	24 Hour	--	35 $\mu g/m^3$		

Table IV.B-1 (Continued)

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standard [a]	National Primary Standard [a]	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Lead	Monthly	1.5 ug/m^3	--	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Quarterly	--	1.5 ug/m^3		
Sulfates (SO_4)	24 hour	25 ug/m^3	--	Decrease in ventilatory functions; aggravation of asthmatic symptoms; aggravation of cardio-pulmonary disease; vegetation damage; degradation of visibility; property damage.	Industrial processes.

[a] *ppm=parts per million and µg/m^3 = micrograms per cubic meter.*
[b] *As of September 21, 2006, SCAQMD adopted a standard methodology for calculating $PM_{2.5}$, which includes a reduced 24-hour national standard.*

Source: California Air Resources Board, Ambient Air Quality Standards, *October 2006.*

how the standards will be met. The 1990 amendments to the CAA identify specific emission reduction goals for basins not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones.

(b) California Air Resources Board

The California Air Resources Board (CARB) is the State agency responsible for the coordination and administration of both state and federal air pollution control programs within California. The CARB undertakes research, sets California Ambient Air Quality Standards (CAAQS), provides technical assistance to local Air Quality Management Districts (AQMDs) and Air Pollution Control Districts (APCDs), compiles emission inventories, develops suggested control measures and provides oversight of local programs.

A key function of the CARB is to coordinate and guide regional and local air quality planning efforts required by the California Clean Air Act (CCAA) and to prepare and submit the State Implementation Plan (SIP) to the USEPA. The California SIP is comprised of plans developed at the regional or local level. Each of these plans is reviewed and approved by the

Table IV.B-2

South Coast Air Basin Attainment Status

Pollutant	National Status	California Status
Ozone (O_3) (1-hour standard)	N/A	Non-attainment
Ozone (O_3) (8-hour standard)	Severe-17	N/A
Carbon Monoxide (CO)	Serious [a]	Attainment [b]
Sulfur Dioxide (SO_2)	Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
PM_{10}	Serious	Non-attainment
$PM_{2.5}$	Non-attainment	Non-attainment
Lead (Pb)	Attainment [b]	Attainment [b]

[a] *The Basin has technically met the CO standards for attainment since 2002, but the official status has not been reclassified by the USEPA.*

[b] *An air basin is designated as being in attainment for a pollutant if the standard for that pollutant was not violated for three consecutive years at any monitoring stations within the air basin.*

Source: California Air Resources Board, 2005.

USEPA prior to incorporation into the SIP. The CARB also establishes emission standards for motor vehicles. The CAA allows California to adopt more stringent vehicle emission standards than the rest of the nation due to the State's severe O_3 non-attainment status.

The CARB has published siting guidelines for development in the Air Quality and Land Use Handbook: A Community Health Perspective (March 2005). The purpose of this document is to highlight the potential health impacts associated with locating sensitive populations in proximity to air pollution sources. The document provides recommendations regarding the siting of new sensitive land uses near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities.

(c) California Clean Air Act

The CCAA, signed into law in 1988, sets forth requirements that apply to emission sources in the State in addition to the CAA. Some portions of the CCAA (e.g., mobile source and consumer product requirements) are implemented directly by California Air Resources Board (CARB). Other portions (e.g., stationary source requirements) are implemented through delegation of authority to local and regional agencies. The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practical date. The CAAQS incorporate additional standards for most of the criteria pollutants and include set standards for other pollutants recognized by the State. In general, the State standards are more health protective than NAAQS. California has also set standards for $PM_{2.5}$, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The Basin is in compliance with the State standards for sulfates, hydrogen sulfide, and vinyl chloride, but does not meet the State standard for visibility reducing particles. Table IV.B-1 details the current NAAQS and CAAQS, while Table IV.B-2 provides the Basin's attainment status with respect to federal and State standards.

(d) South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) has jurisdiction over an area of approximately 10,743 square miles. This area includes all of Orange County, all of Los Angeles County except for the Antelope Valley, the nondesert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The previously discussed Basin is a subregion of the SCAQMD jurisdiction. While air quality in this area has improved, the Basin requires continued diligence to meet air quality standards. The SCAQMD has adopted a series of Air Quality Management Plans (AQMP) to meet the CAAQS and NAAQS. These plans require, among other emissions-reducing activities, control technology for existing sources; control programs for area sources and indirect sources; a SCAQMD permitting system designed to allow no net increase in emissions from any new or modified permitted emission sources; transportation control measures; sufficient control strategies to achieve a five percent or more annual reduction in emissions (or 15 percent or more in a three-year period) for Volatile Organic Compounds (VOC), NO_X, CO, and PM_{10}; and demonstration of compliance with the CARB established reporting periods for compliance with air quality goals.

The SCAQMD adopted a comprehensive AQMP update, the 2003 Air Quality Management Plan for the South Coast Air Basin, on August 1, 2003.[61] The 2003 AQMP outlines the air pollution control measures needed to meet federal health-based standards for O_3 (1-hour standard) by 2010, and PM_{10} by 2006. It also demonstrates how the federal standard for CO, achieved for the first time at the end of 2002, will be maintained.[62] This revision to the AQMP also addresses several State and federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling tools. The 2003 AQMP is consistent with and builds upon the approaches taken in the 1997 AQMP and the 1999 Amendments to the Ozone SIP for the South Coast Air Basin for the attainment of the federal O_3 air quality standard.[63] Lastly, the plan takes a preliminary look at what will be needed to achieve new and more stringent health standards for O_3 and $PM_{2.5}$.

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[61] *South Coast Air Quality Management District, AQMD Website, www.aqmd.gov/news1/aqmp_adopt.htm.*

[62] *The Basin has technically met the CO standards since 2002, but the official attainment status has not been reclassified by the USEPA.*

[63] *Until the 2003 AQMP is officially approved by the USEPA, the 1997 AQMP and the 1999 Amendments to the Ozone SIP will remain in effect.*

The SCAQMD adopts rules and regulations to implement portions of the AQMP. Several of these rules may apply to construction or operation of the project. For example, SCAQMD Rule 403 requires the implementation of best available fugitive dust control measures during active operations capable of generating fugitive dust emissions from onsite earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. SCAQMD Rule 403 is included in Appendix C of this EIR.

The SCAQMD has adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (May 2005), which also considers impacts to sensitive receptors from facilities that emit TAC emissions. SCAQMD's distance recommendations are the same as those provided by CARB (e.g. a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has also published a handbook (*CEQA Air Quality Handbook*, November 1993) that is intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. This handbook provides standards, methodologies and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. In addition, the SCAQMD has published a guidance document (*Localized Significance Threshold Methodology for CEQA Evaluations*, June 2003) (SCAQMD LST Guidance Document) that is intended to provide guidance in evaluating localized effects from mass emissions during construction. These documents were also used in the preparation of this analysis. Recently, the SCAQMD adopted additional guidance regarding $PM_{2.5}$ (*Final-methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds,* October 2006)

(e) Regional Comprehensive Plan and Guide

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated metropolitan planning organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the *Regional Comprehensive Plan and Guide* (RCPG) for the SCAG region, which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation components of the AQMP and are utilized in the preparation of air quality forecasts and the consistency analysis that is included in the AQMP.

(f) County Level – County Congestion Management Plan

The Congestion Management Plan (CMP) for the County of Los Angeles has been developed to meet the requirements of Section 65089 of the California Government Code. In enacting the CMP statute, the State legislature noted the increasing concern that urban congestion was impacting the economic vitality of the State and diminishing the quality of life in many communities. The CMP was created to further the following objectives:

- To link land use, transportation and air quality decisions.
- To develop a partnership among transportation decision makers to encourage appropriate transportation solutions that include all modes of travel.
- To propose transportation projects which are eligible for State gas tax funds?

Please Refer to Section IV.J Transportation and Circulation for additional discussion regarding the CMP.

(g) City of Los Angeles General Plan—Air Quality Element

The most recent revision of the Air Quality Element for the Los Angeles City General Plan was adopted in November 1992. The objectives of this revised Air Quality Element are to aid the region in attaining CAAQS and NAAQS, while continuing to allow economic growth and improvement in the quality of life for city residents. The Air Quality Element and the accompanying Clean Air Program acknowledge the inter-relationships between transportation and land use planning in meeting the City's mobility and clean air goals. To achieve these goals, performance based standards have been adopted to provide flexibility in implementation of the policies and objectives of the City's Air Quality Element. The following General Plan Goals, Objectives and Policies are relevant to the project:

> *Goal 2 – Less reliance on single occupant vehicles with fewer commute and non-work trips.*
>
> > *Objective 2.1 – It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.*
> >
> > > *Policy 2.1.1 – Utilize compressed work week schedules and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in an effort to reduce vehicle trips and/or*

vehicle miles traveled as an employer and encourage the private sector to do the same to reduce vehicle trips and traffic congestion.

Objective 2.2 – It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.

Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentives, mode-shift incentives, trip reduction plans, and rideshare incentives.

Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single occupant vehicle travel by instituting parking management practices.

Policy 2.2.3 – Minimize the use of single occupant vehicles associated with special events, or in areas and times of high levels of pedestrian activities.

b. Existing Air Quality Conditions

(1) Regional Air Quality

The distinctive climate of the Basin, in which the project site is located, is determined primarily by its terrain and geographical location. Regional meteorology is dominated by a persistent high pressure area which commonly resides over the eastern Pacific Ocean. Seasonal variations in the strength and position of this pressure cell cause changes in the weather patterns of the area. Warm summers, mild winters, infrequent rainfall, moderate daytime on-shore breezes, and moderate humidity characterize local climatic conditions. This normally mild climatic condition is occasionally interrupted by periods of hot weather, winter storms, and hot easterly Santa Ana winds.

The Basin is an area of high air pollution potential, particularly from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys and lower in the far inland areas of the Basin and adjacent desert.

Over the past 30 years, substantial progress has been made in reducing air pollution levels in Southern California. The Basin previously was in non-attainment for all NAAQS, except SO_2. The Basin is now in attainment for NO_2, lead, CO and SO_2.[64] PM_{10} and ozone levels, while reduced substantially from their peak levels, are still far from attainment. Year 2003 was the worst smog season in seven years. There were 68 days in 2003 of unhealthful air quality, compared to 49 in 2002 and 36 in 2001. In addition, the Basin experienced its first Stage 1 smog episode during the summer of 2003 since 1998.[65] A Stage 1 episode was recorded after 4:00 P.M. in the central San Bernardino Mountains when ozone levels reached 0.21 parts per million, considered a very unhealthy level. Several other areas, including the Santa Clarita, San Fernando, San Gabriel, and San Bernardino valleys, experienced unhealthy levels of ozone.[66] The Stage 1 episode was primarily due to an unusually strong high pressure system and resulting inversion layer that traps smog close to the ground. However, 2005 was one of the least intrusive smog seasons in recent history.

The SCAQMD has published a Basin-wide air toxic study (MATES II, *Multiple Air Toxics Exposure Study*, March 2000). The MATES II study represents one of the most comprehensive air toxics studies every conducted in an urban environment. The study was aimed at determining the cancer risk from toxic air emissions throughout the Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Basin. The study concluded that the average carcinogenic risk in the Basin is approximately 1,400 in one million and is based on a range from about 1,200 in one million to about 1,740 in one million among ten monitoring stations throughout the Basin. Therefore, there is an inherent health risk associated with living in urbanized areas of Southern California, where mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors to the overall risk. Approximately 70 percent of all risk is attributed to diesel particulate emissions; approximately 20 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde); and approximately 10 percent of all carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses such as dry cleaners and chrome plating operations).

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64 *As indicated above, the Basin has technically met the CO standards since 2002, but the official attainment status has not been reclassified by the USEPA.*

65 *A Stage 1 episode is declared when ozone levels reach a level of 0.20 ppm during a one-hour average. At that level, most people will notice some adverse effects such as shortness of breath, and everyone is urged to avoid strenuous outdoor exercise. Those who are sensitive to smog, including children, the elderly and people with heart and lung diseases, are advised to stay indoors.*

66 *Far inland valleys typically experience the highest ozone readings in the region because they are furthest downwind from the western portion of the Los Angeles Basin, where most air pollution originates. The fact that ozone takes time to "cook" in sunlight means that the highest concentrations occur several hours – and many miles – downwind of major sources.*

(2) Local Area Conditions

(a) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the Basin and has divided the Basin into air monitoring areas or source receptor areas (SRA). The project site is located in the East San Fernando Valley Monitoring Area. The monitoring station for this area is the Burbank Monitoring Station, which is located at 228 West Palm Avenue, approximately ten miles east of the project site. Criteria pollutants, including O_3, CO, NO_2, PM_{10}, $PM_{2.5}$, and SO_2 are monitored at this station. The most recent data available from these monitoring stations encompassed the years 2001 to 2005. The data, shown in Table IV.B-3 on page 148, shows the following pollutant trends:

Ozone (O_3) – The Burbank Monitoring Station measures 1-hour and 8-hour O_3 concentrations. The maximum 1-hour ozone concentration recorded during the 2001 to 2005 period was 0.14 parts per million (ppm), which was recorded in 2004 and 2005. During this period, the California standard of 0.09 ppm was exceeded between 13 and 37 times annually and the federal standard of 0.12 ppm was exceeded between 1 and 4 times annually. The maximum 8-hour ozone concentration recorded during the 2001 to 2005 period was 0.11 ppm, which was recorded in 2003 through 2005. During this period, the federal standard of 0.08 ppm was exceeded between 2 and 21 times annually.

Carbon Monoxide (CO) – The Burbank Monitoring Station measures 1-hour and 8-hour CO concentrations. The maximum recorded 1-hour concentration during the 2001 to 2005 period was 6 ppm, which was recorded in 2001 and 2002. The maximum recorded 8-hour concentration during the 2001 to 2005 period was 4.9 ppm, which was recorded in 2001. During this period, there were no exceedances of the State or federal CO standards.

Nitrogen Dioxide (NO_2) – The highest recorded 1-hour nitrogen dioxide level during the 2001 to 2005 period was 0.26 ppm, which was recorded in 2002. The only exceedance recorded during this period was in 2002.

Sulfur Dioxide (SO_2) – The highest recorded 1-hour sulfur dioxide concentration level during the 2001 to 2005 period was 0.02 ppm, which was recorded in 2004. No violations of the State or federal standards were recorded during this time period.

Particulate Matter (PM_{10}) – The highest recorded concentration level during the 2001 to 2005 period was 92 micrograms of particulates per cubic meter ($\mu g/m^3$), which was recorded in 2005. During this time period, the State PM_{10} standard was exceeded between 6 and 14 days annually, with the highest number of exceedances in 2001 and the lowest number of exceedances

Table IV.B-3

Pollutant Standards and Ambient Air Quality Data
From The Burbank Monitoring Station

Pollutant/Standard	2001	2002	2003	2004	2005
Ozone (O_3)					
O_3 (1-hour)					
Maximum Concentration (ppm)	0.13	0.13	0.13	0.14	0.14
Days > CAAQS (0.09 ppm)	15	17	37	27	13
O_3 (8-hour)					
Maximum Concentration (ppm)	0.10	0.10	0.11	0.11	0.11
4th High 8-hr Concentration (ppm)	n/a	0.09	0.10	0.09	0.08
Days > NAAQS (0.08 ppm)	4	5	21	7	2
Particulate Matter (PM_{10})					
PM_{10} (24-hour)					
Maximum Concentration ($\mu g/m^3$)	86	71	81	74	92
Days > CAAQS (50 $\mu g/m^3$)	14	6	6	6	n/a
Days > NAAQS (150 $\mu g/m^3$)	0	0	0	0	n/a
PM_{10} (Annual Average)					
Annual Geometric Mean (20 $\mu g/m^3$)	37	35	n/a	n/a	n/a
Particulate Matter ($PM_{2.5}$)					
$PM_{2.5}$ (24-hour)					
Maximum Concentration ($\mu g/m^3$)	95	63	121	60	63
Days > NAAQS (65 $\mu g/m^3$) [a]	4	0	1	0	0
$PM_{2.5}$ (Annual)					
Annual Arithmetic Mean (15 $\mu g/m^3$)	25	24	23	19	n/a
Carbon Monoxide (CO)					
CO (1-hour)					
Maximum Concentration (ppm)	6	6	5	5	n/a
Days > CAAQS (20 ppm)	0	0	0	0	n/a
Days > NAAQS (35 ppm)	0	0	0	0	n/a
CO (8-hour)					
Maximum Concentration (ppm)	4.9	4.6	4.7	3.7	3.4
Days > CAAQS (9.0 ppm)	0	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0	0

Table IV.B-3 (Continued)

**Pollutant Standards And Ambient Air Quality Data
From The Burbank Monitoring Station**

Pollutant/Standard	2001	2002	2003	2004	2005
Nitrogen Dioxide (NO_2)					
NO_2 (1-hour)					
Maximum Concentration (ppm)	0.25	0.26	0.14	0.12	0.09
Days > CAAQS (0.25 ppm)	0	1	0	0	0
NO_2 (Annual)					
Annual Arithmetic Mean (0.053 ppm)	0.042	0.040	0.036	0.033	0.029
Sulfur Dioxide (SO_2)					
SO_2 (1-hour)					
Maximum Concentration (ppm)	0.01	0.01	0.01	0.02	n/a
Days > CAAQS (0.25 ppm)	0	0	0	0	n/a
SO_2 (24-hour)					
Maximum Concentration (ppm)	0.004	0.007	0.005	0.007	0.006
Days > CAAQS (0.04 ppm)	0	0	0	0	0
Days > NAAQS (0.14 ppm)	0	0	0	0	0
SO_2 (Annual)					
Annual Arithmetic Mean (0.03 ppm)	0.0001	0.0001	0.0001	0.0001	n/a

ppm = parts per million; $\mu g/m^3$= micrograms per cubic meter; AAM Annual Arithmetic Mean; n/a = not available

Note: Ambient data for airborne lead is not included in this table since the Basin is currently in compliance with State and federal standards for lead.

[a] *As of September 21st, 2006 the USEPA has revised the National $PM_{2.5}$ Standard from 65 $\mu g/m^3$ to 35 $\mu g/m^3$. Data representing days above the NAAQS were compiled for the prior standard.*

Source: South Coast Air Quality Management District, 2000-2002 and California Air Resources Board, 2003-2005.

recorded between 2002 and 2005.[67] No exceedances of the 24-hour federal standard occurred between 2001 and 2005.

[67] *PM_{10} was monitored once every six days at the Burbank Monitoring Station.*

Fine Particulates ($PM_{2.5}$) – The highest recorded 24-hour concentration level during the 2001 to 2005 period was 121 $\mu g/m^3$, which was recorded in 2003. During this time period, the Federal $PM_{2.5}$ standard was exceeded between 0 and 4 days annually, with the highest number of exceedances in 2001 and no exceedances recorded in 2002, 2004 and 2005.[68] The annual standard was exceeded during each of the four years for which data are available.

Lead (Pb) – The Basin is currently in compliance with State and federal standards for lead and monitoring is only conducted periodically since the primary sources of atmospheric lead, leaded gasoline and lead-based paint, are no longer available in the Basin.

(b) Existing Health Risk in the Surrounding Area

According to the SCAQMD's MATES-II study, the cancer risk in the project vicinity is approximately 1,000 to 1,200 in one million, which is approximately 14 to 29 percent lower than the average cancer risk in the Basin of 1,400 per million. The cancer risk in the project vicinity is largely due to diesel particulates generated by motor vehicle sources.

(c) Sensitive Receptors

Some population groups, such as children, the elderly, and acutely ill and chronically ill persons, especially those with cardio-respiratory diseases, are considered more sensitive to air pollution than others. As shown in Figure IV.B-1 on page 151, the project site is surrounding by single-family residences. Specifically, single-family residences are located adjacently to the south, west, and north of the project site.

2. ENVIRONMENTAL IMPACTS

a. Methodology

An evaluation of potential impacts to local and regional air quality that may result from construction and long-term operations of the project was conducted as follows:

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[68] *$PM_{2.5}$ was monitored once every three days at the Burbank Monitoring Station.*

PCR

N

Scale not Provided

Source: PCR Services Corporation., 2006

Figure IV. B-1
Air Quality Sensitive Receptors

Construction-Period Impacts

Mass daily emissions during construction were forecasted by developing a reasonable estimate of construction schedule and phasing, and applying the mobile-source and fugitive dust emissions factors derived from URBEMIS 2002.[69] Emissions for $PM_{2.5}$ are not calculated directly by URBEMIS2002. Activity specific factors need to be applied to the calculated PM_{10} emissions.[70] An emission factor of 21%, 89% and 99% was applied to earth moving equipment, off-road equipment, and on-road equipment respectively. Details are presented in Appendix C. The localized effects from the on-site portion of daily emissions were evaluated at each sensitive receptor location potentially impacted by the Project using the SCAQMD's localized significance threshold (LST) methodology, which utilizes on-site mass emissions rate look up tables. These tables have been developed to serve as a screening level analysis to determine the potential for localized impacts based on the distance between on-site emissions sources and sensitive receptor locations. If the screening level criteria are exceeded, then emissions would be modeled using SCAQMD's recommended Industrial Source Classification (ISC) model to determine if an exceedance of either the NAAQS or the CAAQS would occur. A complete listing of the construction equipment by phase, construction phase duration, emissions estimation model and dispersion model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix C of this Draft EIR.

Operations-Period Impacts

The URBEMIS 2002 software was used to forecast the mass daily emissions estimates from mobile- and area-sources that would occur during long-term project operations. Similar to construction impacts, $PM_{2.5}$ fractions need to be applied to the URBEMIS2002 operational emission output data. A $PM_{2.5}$ emission factor of 99% must be applied to all stationary operational equipment and on-road mobile sources. In calculating mobile-source emissions, the URBEMIS 2002 default trip length assumptions were applied to the average daily trip (ADT) estimates provided by the project's traffic consultant to arrive at vehicle miles traveled (VMT). Stationary-source emissions were compiled using procedures outlined in the SCAQMD *CEQA Handbook*. Localized CO concentrations were evaluated using the CALINE4 microscale dispersion model, developed by Caltrans, in combination with EMFAC2002 emission factors. All emissions calculation worksheets and air quality modeling output files are provided in Appendix C of this Draft EIR.

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[69] *URBEMIS 2002 is an emissions estimation/evaluation model developed by the CARB that is based, in part, on SCAQMD* CEQA Air Quality Handbook *guidelines and methodologies.*

[70] *$PM_{2.5}$ Calculation Methodology was adopted by SCAQMD in October 2006.*

b. Thresholds of Significance

Construction Emissions

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis for evaluation of significance:

Combustion Emissions from Construction Equipment

- Type, number of pieces and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

Fugitive Dust

Grading, Excavation and Hauling:

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

Other Mobile Source Emissions

- Number and average length of construction worker trips to the project site, per day; and
- Duration of construction activities.

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, they do not constitute a threshold to which the resultant emissions may be compared for purposes of determining significance. Therefore, the following thresholds from the SCAQMD will be utilized. The project would have a significant impact from construction activities if:

- Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOC, (2) 100 pounds per day for NO_X, (3) 550 pounds per day for CO, (4) 150 pounds per day for PM_{10} or SO_X[71], and (5) 55 pounds per day for $PM_{2.5}$.[72]

- Project-related fugitive dust and construction equipment combustion emissions cause a violation of NO_2 and CO AAQS[73] or an incremental increase in localized PM_{10} or $PM_{2.5}$ concentrations of 10.4 $\mu g/m^3$.

- The project creates objectionable odors.

Operational Emissions

Thresholds of significance regarding operational emissions are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on air quality from project operations if any of the following would occur:

- Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC, (2) 55 pounds per day for NO_X, (3) 550 pounds per day for CO, (4) 150 pounds per day for PM_{10} or SO_X[74], and (5) 55 pounds per day for $PM_{2.5}$.[75]

- Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

  – The project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or

[71] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.*

[72] *South Coast Air Quality Management District, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006*

[73] *While the SCAQMD* CEQA Air Quality Handbook (CEQA Handbook*, 1993), does not provide any localized thresholds, the SCAQMD currently recommends localized significance thresholds (LST) for PM_{10}, NO_2, and CO in its draft document titled "SCAQMD Localized Significance Threshold Methodology for CEQA Evaluations (SCAQMD LST Guidelines)," June 19, 2003.*

[74] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.*

[75] *South Coast Air Quality Management District, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds, October 2006*

- The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

- The project creates an objectionable odor at the nearest sensitive receptor.

These thresholds will be applied to the proposed project.

In addition to the above thresholds established by the City, the SCAQMD has established the following thresholds by which to determine whether a project would have a significant operational air quality impact:

- The project would not be compatible with SCAQMD and SCAG air quality polices if it:
  - causes an increase in the frequency or severity of existing air quality violations;
  - causes or contributes to new air quality violations;
  - delays timely attainment of air quality standards or the interim emission reductions specified in the AQMP; or
  - exceeds the assumptions utilized in the SCAQMD's AQMP.

Additionally, for the purposes of this analysis, a project would have a significant impact if it would conflict with adopted air quality management plans.

Toxic Air Contaminants

The following factors are set forth in the City of Los Angeles "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis in making a determination of significance:

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the toxic air contaminants to sensitive receptors;
- The quantity, volume and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

Based on these factors, the project would have a significant toxic air contaminant impact, if:

- On-site stationary sources emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of ten in one million or an acute or chronic hazard index of 1.0.[76]

- Hazardous materials associated with on-site stationary sources result in an accidental release of air toxic emissions or acutely hazardous materials posing a threat to public health and safety.

- The project would be occupied primarily by sensitive individuals within a quarter mile of any existing facility that emits air toxic contaminants which could result in a health risk for pollutants identified in District Rule 1401.[77]

c. Analysis of Project Impacts

(1) Construction

Construction emissions for the project are based on both current emission factor data and the magnitude of development for the project. The total amount of construction, the duration of construction and the intensity of construction activity could have a substantial effect upon the amount of construction emissions, concentrations and the resulting impacts occurring at any one time. As such, the emission forecasts provided reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of construction is occurring in a relatively intensive manner. Because of these conservative assumptions, actual construction emissions would be, in all probability, less than those forecasted.

(a) Regional Construction Impacts

Construction of the project has the potential to create air quality impacts through earth moving operations and the use of heavy-duty construction equipment. Fugitive dust emissions result from demolition, ground excavation, cut and fill operations, and equipment traffic over temporary roads at construction sites. Mobile source emissions, primarily NO_X, result from the use of construction equipment such as bulldozers, trucks, and scrapers. These emissions are

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[76] *SCAQMD Risk Assessment Procedures for Rules 1401 and 212, November 1998.*

[77] *SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), April 1993.*

highest when using heavy-duty, diesel-fueled equipment. Mobile source emissions also result from vehicle trips by construction workers to and from the project site. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials release volatile organic compounds. Emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity occurring and, for dust, the prevailing weather conditions. The assessment of construction air quality impacts considers each of these potential sources. Project-related factors used to evaluate construction air quality impacts include the following:

- Combustion Emissions from Construction Equipment: Type, number of pieces and usage for each type of construction equipment; estimated fuel usage and type of fuel (diesel, gasoline) for each type of equipment; and emission factors for each type of equipment.

- Fugitive Dust—Grading, Excavation, and Hauling: Amount of soil to be disturbed on-site or moved off-site; emission factors for disturbed soil; duration of grading, excavation, and hauling activities; type and number of pieces of equipment to be used; and projected haul routes.

- Other Mobile Source Emissions: Number and average length of construction worker trips to the project site, per day; and the duration of construction activities.

As discussed in Section II, Project Description, the project would include the demolition of six buildings, construction of five new/replacement buildings, a central plant, addition to and/or renovation of several existing buildings, improvements to vehicular circulation and queuing, and increased parking within a new enclosed parking facility. Construction of the project would be completed in three general phases, Phases 1, 2 and 3. Each general phase may consist of construction on several non-contiguous parcels or buildings for which certain construction equipment is assigned. For purposes of analyzing construction air quality impacts, each general phase is further broken down into subphases, when possible, in order to more accurately determine emissions on a daily basis.

The three general phases of construction would occur over the course of approximately three and a half years, spread out over a six-year timeframe. Anticipated construction schedules are as follows: Phase 1 – two months of preparatory work beginning in March 2009, then approximately 12 months beginning in May 2009; Phase 2 – two months of preparatory work beginning in March 2011, then approximately 18 months beginning in May 2011; Phase 3 – two months of preparatory work beginning in March 2013, then 12 months of construction occurring over a two-year period beginning in May 2013. As planned, each construction phase would begin with an approximate two month period of minor preparatory work, with more intensive construction activities beginning in approximately May of each phase, coinciding with the end of the school year.

The possibility exists that Phase 2 might begin as early as 2010, with some preliminary work for Phase 2 overlapping with completion of Phase 1. For purposes of a conservative analysis, this second overlapping scenario has been assumed in this analysis. In addition, sub-phase Phase 3D, which consists of the renovation of the lower school buildings, would take place over a summer vacation period. In order to allow a degree of flexibility in the construction schedule and the school operating schedule, there is an option for Phase 3D to be completed during the summer of 2013 or 2014. In order to present the worst case scenario, construction emissions have been analyzed to account for Phase 3D occurring during either of these years.

Implementation of the project would require some modification of the existing topography during Phases 1 and 2. Much of the grading would occur in previously developed or paved areas. However, some grading activities would occur adjacent to the slopes that line the canyon. Overall, grading would require an estimated 15,674 cubic yards of cut and an estimated 15,674 cubic yards of fill, for a nearly balanced site in terms of earthwork. Some incidental import or export (i.e., less than 1,000 cubic yards) would also be required.

The equipment mix and construction duration for each phase and stage of construction is included in the construction emissions inventory provided in Appendix C of this EIR. Unmitigated daily construction-related regional emissions for the project are presented in Table IV.B-4 on page 159. As shown therein, the maximum regional emissions would occur during Phase 2 construction of the new Middle and Upper School Main Academic Center building and enclosed Parking Facility. As shown, maximum regional construction emissions would not exceed the SCAQMD daily significance thresholds for PM_{10}, $PM_{2.5}$, CO, VOC or SO_X. However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO_X. Therefore, regional construction emissions resulting from the project would result in a significant short-term impact.

(b) Local Construction Impacts

Emissions for the localized construction air quality analysis were compiled using the regional construction emissions less off-site emissions (e.g., construction worker, delivery, haul truck trips). Localized emissions were then compared to the localized significance thresholds (LST) screening tables promulgated by the SCAQMD.[78] LSTs for CO and NO_2 were derived by

[78] *SCAQMD developed LSTs based upon the size or total area of the emissions source, the ambient air quality in each source receptor area, and the distance to the sensitive receptor.*

Table IV.B-4

Unmitigated Project-Related Regional Construction Emissions (pounds per day)

	CO	NOx	PM_{10}[a]	$PM_{2.5}$[a]	VOC	SOx
Phase 1 (New Library and Technology Center)	137	123	12	4	28	<1
Phase 2 (New Middle and Upper School Main Academic Building and Parking Facility)	271	251	39	12	42	<1
Phase 3A (New Academic Building West)	126	106	3	2	15	<1
Phase 3B (Addition and Renovation of Existing Academic Building South)	125	102	4	2	17	<1
Phase 3C (Disney Pavilion Renovation)	127	98	2	2	28	<1
Phase 3C (New Outdoor Aquatic Center)	137	107	4	2	17	<1
Phase 3D (Lower School Renovations)	60	41	1	2	15	<1
Max Overlapping Construction[b]	**312**	**251**	**39**	**12**	**42**	**<1**
Regional Daily Significance Threshold	550	100	150	55	75	150
Over/(Under)	(238)	151	(111)	(43)	(33)	(150)
Exceed Threshold?	No	**Yes**	No	No	No	No

[a] *$PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[b] *Maximum regional CO emissions occur during combined Phase 3B, Phase 3C and Phase 3D occurring during Year 2014 construction. Maximum regional emissions for all pollutants occur during Phase 2*

Source: PCR Services Corporation, 2006

adding the incremental emissions from the project to the peak background NO_2 and CO concentrations and comparing the total concentration to the most stringent air quality standards. Construction PM_{10} LSTs were derived using a dispersion model to back-calculate the level of emissions necessary to exceed SCAQMD's Rule 403 concentration level (50 μg/m^3 over five hours) for requiring implementation of best management practices for control of fugitive dust.[79]

The unmitigated maximum daily localized emissions and localized significance thresholds are presented in Table IV.B-5 on page 161. As shown therein, maximum localized

[79] *The equivalent concentration for developing PM_{10} or $PM_{2.5}$ LSTs is 10.4 μg/m^3, which is a 24-hour average.*

construction emissions would not exceed the localized screening thresholds for CO, NO_X or $PM_{2.5}$ during any phase. However, the maximum localized emissions would exceed the localized screening thresholds for PM_{10} during site preparation activities for Phase 2. As such, construction activity would result in a localized PM_{10} impact to sensitive receptors in close proximity to the project site.

As previously discussed, certain population groups, including children, are considered more sensitive to air pollution than others. Students attending The Buckley School may also be exposed to increased PM_{10} concentrations if they are outside in close proximity to the construction area throughout the entire school day during construction activities. However, since students are typically outside for a maximum of a few of hours during the school day, potential localized PM_{10} impacts would be considerably lower. Nevertheless, project construction would result in a localized PM_{10} impact to students attending The Buckley School.

(i) Toxic Air Contaminants

As discussed in Section IV.F., Hazardous Materials, of this EIR, a bus maintenance garage was previously located at the project site near the existing Transportation Building. In addition, a UST was formerly located in the parking lot area southwest of the existing Academic Building South. Therefore, during site grading activities and the removal of building foundations and asphalt pavement, there is a potential for small amounts of VOC and related toxic air contaminants (TAC) emissions to be released into the environment. If contaminated soils are encountered during excavation/grading activities, the project would be subject to SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) requirements. Among other requirements, up-wind and down-wind monitors would be used to ensure that potential toxic air concentrations remain within SCAQMD permitted levels. Complete Rule 1166 requirements are provided in Appendix C to this EIR.

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given that the majority of grading and excavation activities would occur intermittently during Phase 2, the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would not be significant.

Table IV.B-5

Unmitigated Project-Related Local Construction Emissions
(pounds per day)

	CO	NOx	PM_{10}[a]	$PM_{2.5}$[a]	VOC	SOx
Phase 1 (New Library and Technology Center)	120	86	11	3	24	<1
Phase 2 (New Middle and Upper School Main Academic Building and Parking Facility)	224	160	37	10	35	<1
Phase 3A (New Academic Building West)	112	82	3	2	13	<1
Phase 3B (Addition and Renovation of Existing Academic Building South)	112	82	4	2	15	<1
Phase 3C (Disney Pavilion Renovation)	111	82	2	1	27	<1
Phase 3C (New Outdoor Aquatic Center)	118	84	4	2	14	<1
Phase 3D (Lower School Renovations)	47	34	1	1	13	<1
Max Overlapping[b]	277	200	37	10	35	<1
LST Threshold (5 acre site with 25 meter receptor distance)[c]	994	262	13	13	-	-
Over/(Under)	(717)	(62)	24	(3)	-	-
Exceed Threshold?	No	No	**Yes**	No	No	No

[a] *$PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[b] *Maximum localized CO and NOx emissions occur during combined Phase 3B, Phase 3C and Phase 3D occurring during Year 2014 construction. Maximum localized PM_{10} and VOC emissions occur during Phase 2.*

[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 7. These LSTs are based on the site location SRA and project area that could be under construction on any given day. In regard to the LST look-up tables, the analysis assumed a five-acre site with a 25 meter receptor distance.*

Source: PCR Services Corporation, 2006

(ii) Odors

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. As such, odor impacts during construction would not be significant.

(2) Operations

Project operational impacts were evaluated for a project buildout year of 2014. Although construction would continue through 2015, the potential operational impacts associated with the project are linked to the proposed student enrollment increase, with the full enrollment of 830 students anticipated to occur by the 2014–2015 school year. In order to properly analyze operational emissions, it is important to assign appropriate emissions and emission factors to the individual emissions sources. Mobile source emission forecasts are sensitive to the forecast year, as future mobile source emission factors are substantially reduced as cleaner on-road vehicles are introduced into the county-wide vehicle fleet.

(a) Regional Operation Impacts

Air pollutant emissions associated with project occupancy and operation would be generated by both the consumption of energy (electricity and natural gas) and by the operation of on-road vehicles. Emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions. Electricity is considered an area source since it is produced at various locations within, as well as outside of, the Basin. Since it is not possible to isolate where electricity is produced, these emissions are considered to be regional in nature. Emissions related to natural gas consumption would occur on the project site. Criteria pollutant emissions associated with the production and consumption of energy were calculated using emission factors from the SCAQMD's *CEQA Air Quality Handbook* (Appendix to Chapter 9).

Emissions modeled for the regional on-road air quality analysis were compiled using the URBEMIS2002 emission inventory model. This computer model provides emission rates for motor vehicles based on a desired year of analysis and selected type of land use. Assumptions used in preparing the model analysis were consistent with those recommended in SCAQMD's *CEQA Air Quality Handbook* (Appendix to Chapter 9). The regional on-road emissions were based on average daily trips provided in the project traffic analysis prepared by Crain and Associates.[80] Similar to construction, emissions for $PM_{2.5}$ are not calculated directly in URBEMIS 2002. Factors provided by the SCAQMD were applied to the PM_{10} emissions.

Emissions from miscellaneous sources such as landscape and garden equipment were not considered in this analysis because current emissions from those sources are not expected to substantially change with campus enhancements. To calculate regional emissions solely attributable to the project, emissions from new vehicle trips associated with the project were combined with stationary emissions generated by additional building square footage associated with the project. Project emissions are shown in Table IV.B-6 on page 163. As indicated therein, regional emissions resulting from operation of the project are expected to be well below the SCAQMD thresholds for all criteria pollutants. In addition, emissions may even be lower with implementation of the TDM Plan goal of achieving a zero net increase in vehicular trips.

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[80] *The project's average daily trips are presented in Section IV.L, Transportation/Circulation, of the EIR.*

Table IV.B-6

Project-Related Operational Emissions
(Pounds/Day)

Emission Source	CO	NO_X	PM_{10}	$PM_{2.5}$	VOC	SO_X
Project Emissions						
On-road Mobile Sources [a]	22	3	3	3	3	<1
Stationary Sources [b]	<1	2	<1	<1	<1	<1
Total Project Emissions	**23**	**5**	**3**	**3**	**3**	**<1**
SCAQMD Significance Threshold	550	55	150	55	55	150
Over (Under)	**(527)**	**(50)**	**(147)**	**(52)**	**(52)**	**(150)**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

[a] *Calculated based on average daily trips, as presented in Section IV.G., Transportation/Circulation, of this EIR.*
[b] *Based on electricity and natural gas consumption obtained from the SCAQMD's CEQA Air Quality Handbook (Appendix to Chapter 9).*

Source: PCR Services Corporation, 2006.

(b) Local Operation Impacts

During the operational phase of the project, traffic would have the potential to produce local area impacts. An analysis of a selected intersection was performed to determine the potential for the creation of CO impacts (hotspots). Local area CO concentrations were projected using the CALINE-4 traffic pollutant dispersion model.

Intersections are selected for local CO analysis based on their Level of Service (LOS), the project's traffic contribution to the intersection and the proximity of the intersection to sensitive receptors. Based on these factors, only one intersection, located at Stansbury Avenue and Valley Vista Boulevard, was selected for analysis of localized CO impacts.

This intersection has the highest potential for CO hotspot formation due to a poor LOS (functioning near or above capacity) and higher project traffic contributions. LOS values and traffic volumes are provided in the project traffic study, prepared by Crain & Associates and included as Appendix L to this EIR. Based upon guidance from the SCAQMD, an ambient CO concentration was projected for 2014 based on one-hour and 8-hour tables provided in the SCAQMD Air Quality Analysis Guidance Handbook.[81] The results of the local area CO dispersion analysis are presented in Table IV.B-7 on page 164.

[81] http://www.aqmd.gov/ceqa/hdbk. *(CO Concentrations for Hotspot Analysis – Burbank Monitoring Station.)*

Table IV.B-7

Weekday Traffic Local Area Carbon Monoxide Dispersion Analysis

Intersection	Peak Period[a]	Maximum 1-Hour 2014 Base Concentration [b] (ppm)	Maximum 1-Hour 2014 w/Project Concentration [c] (ppm)	Significant 1-Hour Impact [d]	Maximum 8-Hour 2014 Base Concentration [e] (ppm)	Maximum 8-Hour 2014 w/Project Concentration [f] (ppm)	Significant 8-Hour Impact [d]
Valley Vista Boulevard and Stansbury Avenue	A.M.	7.6	7.6	NO	6.9	6.9	NO
	School P.M.	7.1	7.1	NO	6.7	6.7	NO
	Commuter P.M	7.1	7.1	NO	6.8	6.8	NO

ppm = parts per million.

[a] *Peak hour traffic volumes are based on the Traffic Analysis prepared for the project by Crain & Associates, March 2006.*

[b] *SCAQMD 2014 1-hour ambient background concentration (6.6 ppm) + 2014 Base traffic CO 1-hour contribution.*

[c] *SCAQMD 2014 1-hour ambient background concentration (6.6 ppm) + 2014 w/project traffic CO 1-hour contribution.*

[d] *The most restrictive standard for 1-hour CO concentrations is 20 ppm and for 8-hour concentrations is 9.0 ppm.*

[e] *SCAQMD 2014 8-hour ambient background concentration (6.5 ppm) + 2014 Base traffic CO 8-hour contribution.*

[f] *SCAQMD 2014 8-hour ambient background concentration (6.5 ppm) +2014 w/project traffic CO 8-hour contribution.*

Source: PCR Services Corporation, 2006.

As shown, project-related traffic is not anticipated to result in any exceedances of the State one-hour CO standard of 20 ppm at the study intersection during the A.M., School P.M., or commuter P.M. peak periods. Similarly, eight-hour CO concentrations would remain below the State standard of 9 ppm. Since significant impacts would not occur at the intersections with the highest potential for CO hotspot formation, no significant impacts are anticipated to occur at any other locations in the project vicinity as a result of the proposed project, since the components yielding CO hotspots would not be greater than those occurring at the analyzed intersection. Consequently, sensitive receptors in the area would not be significantly affected by CO emissions generated by project-related traffic. Localized air quality impacts related to mobile source emissions during project operations would therefore be less than significant.

(c) Air Toxic Impacts

Potential sources of air toxic emissions at the campus are limited to diesel particulates from school buses as well as small amounts of toxics from consumer products. School bus operations would be required to abide by the CARB Air Toxic Control Measure (ATCM) that limits school bus idling. The ATCM requires a school bus driver to turn off the bus engine upon arriving at a school and to restart no more than 30 seconds before departing. A driver of a school bus is subject to the same requirement when operating within 100 feet of a school and is prohibited from idling more than five minutes at each stop beyond schools, such as activity destinations. As such, no change in the baseline conditions established in Section IV.1(b)(2)(b), *Existing Health Risk in the Surrounding Area*, would be anticipated. While some increases in consumer products such as cleaning compounds, glues, polishes, floor finishes, room fresheners, paint and lawn care products can be anticipated, the volume of such products used by the school today or in the future would be very small and would generally occur after school hours. It should be noted that chlorine used for pool sanitation would be stored on campus. However, chlorine is used to sanitize the existing pool facility and the amount of chlorine stored on campus would not be increased. The chlorine would not be stored in sufficient amounts to comprise an air toxic health hazard. Therefore, air toxic emissions associated with the project would not result in a significant impact.

In addition to the analysis of potential on-site sources of air toxics, an analysis was also conducted to determine whether the proposed project would result in the siting of sensitive receptors near existing off-site sources of toxic air contaminants that would result in a significant health impact. The project was analyzed using the Air Quality and Land Use Handbook developed by the CARB.[82] The proposed project would not result in the siting of sensitive receptors within the recommended buffer zones for various sources of air toxics (e.g., dry cleaners, distribution centers, chrome plating facilities). Therefore, the project would be consistent with the CARB's Air Quality and Land Use Handbook.

(d) Odor Impacts

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The project does not include any uses identified by the SCAQMD as being associated with odors. Therefore, the project would not create adverse odors as discussed above and would have no impact related to objectionable odors.

(e) Consistency with Adopted Plans and Policies

In accordance with the procedures established in the SCAQMD CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the proposed project's consistency with SCAQMD and Southern California Association of Governments (SCAG) policies: [83]

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[82] *Air Quality and Land Use Handbook: A Community Health Perspective, California Air Resources Board, March 25, 2005.*

[83] *SCAG is the federally designated Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial. As the designated MPO, SCAG is mandated by the*
(Footnote continued on next page)

1. Will the project result in any of the following:

   - An increase in the frequency or severity of existing air quality violations; or
   - Cause or contribute to new air quality violations; or
   - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Will the project exceed the assumptions utilized in preparing the AQMP?

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in a regional context during construction and project occupancy. These forecasts are provided earlier in this section. Since the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than to total regional emissions, an analysis of the project's pollutant emissions on localized pollutant concentrations is used as the basis for evaluating project consistency.[84] As discussed in the preceding sections, localized concentrations for PM_{10}, $PM_{2.5}$, CO, and NO_2 have been analyzed for the project. SO_2 emissions would be negligible during construction and long-term operations, and therefore would not have potential to cause or affect a violation of the SO_2 ambient air quality standard. There is no localized threshold for VOC emissions, only a regional emissions threshold.

Particulate matter is the primary pollutant of concern during construction activities, and therefore, the project's PM_{10} and $PM_{2.5}$ emissions during construction were analyzed (1) to ascertain potential effects on localized concentrations and (2) to determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM_{10} and $PM_{2.5}$.. Results of the analyses indicate that the increase in $PM_{2.5}$ emission are below LST. However, PM_{10} emissions during construction would exceed the SCAQMD-recommended PM_{10} significance threshold at sensitive receptors in close proximity to the project site. However, the potential for this impact would be short-term and would not have a long-term impact on the region's ability to meet State and federal air quality standards. In addition, the project would be required to comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM_{10}. Nevertheless, the project would have a significant temporary impact on localized PM_{10} concentrations.

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federal government to develop and implement regional plans that address transportation, growth management, hazardous waste management, and air quality issues.

[84] *South Coast Air Quality Management District, CEQA Air Quality Handbook, p. 12-3, 1993.*

In addition, the project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. The analysis concluded that CO and NO_2 concentrations would not exceed California or National AAQS, and potential impacts would therefore be less than significant.[85]

During long-term project operations, CO is the benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations. Based on methodologies set forth by the SCAQMD, one measure of local area air quality impacts that can indicate whether the project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the project site. As indicated earlier, CO emissions were analyzed using the CALINE-4 model. No violations of the State and federal carbon monoxide standards are projected to occur. Overall, the project would result in less than significant impacts with regard to CO, NO_2 and SO_2 concentrations during project construction and operations. While PM_{10} concentrations during construction would exceed the SCAQMD significance threshold, the impact would be short-term in nature and would not have a long-term impact on the region's ability to meet State and federal air quality standards. As such, the project would meet the first AQMP consistency criterion.

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it must be recognized that air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP.

Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with the population, housing and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis of each of these three criteria.

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[85] *Please note that NO_x is used when describing emissions of nitrogen oxides, but that the AAQS is in terms of NO_2 (pollutant concentration). The same applies for SO_x (emissions) versus SO_2 (AAQS concentration).*

- Is the project consistent with the population, housing and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2003 AQMP, two sources of employment data form the basis for the projections of air pollutant emissions, including the City of Los Angeles General Plan and SCAG's Growth Management Chapter of the *Regional Comprehensive Plan and Guide* (*RCPG*). The project is consistent with the types, intensity and patterns of land use envisioned for the site vicinity in the RCPG. Please refer to Section IV.B, Land Use, of this EIR for additional information regarding land use consistency.

In addition, the *Regional Transportation Plan* (*RTP*), adopted by SCAG, projects that employment in the City of Los Angeles subregion, in which the project site is located, will grow by approximately 197,765 jobs between 2005 and 2015. The project is projected to result in a net increase of approximately 16 full-time equivalent jobs at the project site, or less than 0.01 percent of the total job growth projected for the subregion. This level of employment growth would not be sufficiently large enough to call into question the employment forecasts for the subregion adopted by SCAG. Because the SCAQMD has incorporated these same projections into the AQMP, it can be concluded that the project would be consistent with the projections in the AQMP.

- Does the project implement all feasible air quality mitigation measures?

The project would implement feasible mitigation measures to reduce air quality impacts in part through the issuance of required approvals and permits by the SCAQMD and other agencies. The project would also incorporate a wide array of key air pollution control strategies through compliance with SCAQMD's rules and regulations (i.e., Rule 403 Fugitive Dust).

- To what extent is project development consistent with the land use policies set forth in the AQMP?

The project would be consistent with City of Los Angeles and SCAG land use policies with respect to the proposed project, as discussed in Section IV.B, Land Use, of this EIR.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the project on air quality in the Basin. While development of the project would result in short-term regional impacts, project development would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM_{10}. Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. As discussed above, the project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

Based on the analysis above, the proposed project would meet the criteria specified by the SCAQMD which are used to determine consistency with applicable SCAQMD and SCAG policies. The project would therefore be consistent with adopted air quality plans and policies.

3. MITIGATION MEASURES

The following mitigation measures set forth a program of air pollution control strategies designed to reduce the project's air quality impacts.

a. Construction

Mitigation Measure B-1: In addition to SCAQMD Rule 403 requirements, all land clearing/earth-moving activity areas shall be watered as necessary to remain visibly moist during active operations.

Mitigation Measure B-2: All construction roads internal to the construction site that have a traffic volume of more than 50 daily trips by construction equipment, or 150 total daily trips for all vehicles, shall be surfaced with base material or decomposed granite.

Mitigation Measure B-3: Streets shall be swept as needed during construction, but not more frequently than hourly, if visible soil material has been carried onto adjacent public paved roads.

Mitigation Measure B-4: Construction equipment shall be visually inspected prior to leaving the site and loose dirt shall be washed off with wheel washers as necessary.

Mitigation Measure B-5: Water three times daily or non-toxic soil stabilizers shall be applied, according to manufacturers' specifications, as needed to reduce off-site transport of fugitive dust from all unpaved staging areas and unpaved road surfaces.

Mitigation Measure B-6: Establish an on-site construction equipment staging area and construction worker parking lots, located on either paved surfaces or unpaved surfaces subject to soil stabilization.

Mitigation Measure B-7: Traffic speeds on all unpaved roads shall not exceed 15 mph.

Mitigation Measure B-8: All equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure B-9: To the extent possible, petroleum powered construction activity shall utilize electricity from power poles rather than temporary diesel power generators and/or gasoline power generators.

Mitigation Measure B-10: Use on-site mobile equipment powered by alternative fuel sources (i.e., methanol, natural gas, propane or butane) as feasible.

Mitigation Measure B-11: General contractors shall maintain and operate construction equipment such that exhaust emissions are minimized. For example, engines shall be turned off while in queues or while loading/unloading. In addition, heavy equipment and petroleum-powered generators shall be turned off when not in use.

Mitigation Measure B-12: Petroleum-powered equipment shall be turned off during second-stage smog alerts.

Mitigation Measure B-13: Develop a construction traffic management plan that includes, but is not limited to: (1) consolidating truck deliveries; (2) providing a rideshare or shuttle service for construction workers; and (3) providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

Mitigation Measure B-14: The project shall include energy-saving double-glazed windows in all new structures to the extent feasible.

Mitigation Measure B-15: Outdoor activities of children on-site and school scheduling shall be coordinated to prevent undue exposure of students to active demolition and site grading activities.

b. Operation

During the operational phase, the proposed project would not result in any significant impacts to air quality and, therefore, no mitigation measures are recommended or required.

4. CUMULATIVE IMPACTS

The SCAQMD has set forth both a methodological framework as well as significance thresholds for the assessment of a project's cumulative air quality impacts. The SCAQMD's methodology differs from the cumulative impacts methodology employed elsewhere in this EIR, in which foreseeable future development within a given service boundary or geographical area is predicted and associated impacts measured. The SCAQMD's approach for assessing cumulative impacts is based on the SCAQMD's AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts, taking into account SCAG's forecasted future regional growth and determining whether the project is consistent with the forecasted future regional growth. Therefore, if all cumulative projects are individually consistent with the growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur. Cumulative air quality impacts for the project were evaluated in the context of Los Angeles County as a whole for the projected operational buildout year of 2014, consistent with the SCAQMD's methodology.

Based on the SCAQMD's methodology (presented in Chapter 9 of the *CEQA Air Quality Handbook*), a project would have a significant cumulative air quality impact if the ratio of daily project employee vehicle miles traveled to daily countywide vehicle miles traveled exceeds the ratio of daily project employees to daily countywide employees. An assessment of the project's cumulative impacts associated with the project is presented in Table IV.B-8 on page 172. As shown, the project employee-related rate of growth in vehicle miles traveled is not greater than the project-related rate of growth in employment. In addition, as shown in Table IV.B-7 on page 164 , cumulative traffic would not result in any local CO violations at the studied intersection. Therefore, the project would not have a significant cumulative impact on air quality.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, as shown in Table IV.B-9 on page 173, the project would

Table IV.B-8

Project Cumulative Air Quality Impacts

Daily Vehicle Miles Traveled for Project Employment [a]	268
Daily Vehicle Miles Traveled Countywide [b]	217,749,000
Daily Vehicle Miles Traveled Ratio	**0.000001**
Project Employment Increase [a]	16
Countywide Employment [c]	5,092,825
Employment Ratio	**0.000003**
Significance Test --	
Daily Vehicle Miles Traveled Ratio Greater Than Employment Ratio	**No**

[a] *Data obtained from URBEMIS2002. Represents mileage associated with increased employment due to the project.*
[b] *Data obtained from EMFAC 2002.*
[c] *Data obtained from SCAG's Regional Transportation Plan, Socioeconomic Projections, 2004.*

Source: PCR Services Corporation, 2006.

remain in exceedance of the SCAQMD regional significance thresholds for NO_x during the most intense construction period. As such, project construction would continue to result in a significant regional impact even with incorporation of all feasible mitigation measures.

Implementation of the mitigation measures described above would reduce localized PM_{10} emissions by 30 percent. However, as shown in Table IV.B-10 on page 174, the project would remain in exceedance of the SCAQMD LST screening table threshold value for Phase 2 construction. Therefore, a refined localized analysis was conducted to determine the extent of the impact. According to the U.S. EPA 1998 Guideline on Air Quality Models, the U.S. EPA Industrial Source Complex Short Term (ISCST) model should be used for computing downwind pollutant concentrations from area/volume sources such as construction activity. The ISCST model inputs took into account overlapping phase activity. The ISCST model was run using the SCAQMD mandated 1981 meteorological data from the Burbank Monitoring Station and provided on the SCAQMD web site (www.aqmd.gov).

As indicated in the model, construction-related PM_{10} levels would exceed the localized concentration increase threshold of 10.4 μg/m^3 during Phase 2 site preparation activities. The maximum localized PM_{10} concentration during Phase 2 activity would be located along Camino de la Cumbre with a concentration of 35.6 μg/m^3. The ISCST modeled potential impacts are based on a set of conservative assumptions that incorporate worst-case 1981 SCAQMD mandated meteorological conditions and maximum daily PM_{10} emissions occurring every day throughout the entire modeled year. Therefore, if grading activities during Phase 2 occurred for the entire year, although they are expected to occur only for three months, at the maximum rate

Table IV.B-9

Mitigated Project-Related Regional Construction Emissions (pounds per day)

	CO	NOx	PM_{10}[a]	$PM_{2.5}$[a]	VOC	SOx
Phase 1 (New Library and Technology Center)	131	118	9	4	27	<1
Phase 2 (New Middle and Upper School Main Academic Building and Parking Facility)	260	243	28	9	41	<1
Phase 3A (New Academic Building West)	120	102	2	2	15	<1
Phase 3B (Addition and Renovation of Existing Academic Building South)	119	98	3	2	17	<1
Phase 3C (Disney Pavilion Renovation)	121	94	2	2	28	<1
Phase 3C (New Outdoor Aquatic Center)	131	103	4	2	16	<1
Phase 3D (Lower School Renovations)	57	39	1	1	15	<1
Max Overlapping Construction[b]	298	243	**28**	9	41	<1
Regional Daily Significance Threshold	550	100	150	55	75	150
Over/(Under)	(252)	143	(122)	(46)	(34)	(150)
Exceed Threshold?	No	**Yes**	No	No	No	No

[a] *$PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[b] *Maximum localized CO emissions occur during combined Phase 3B, Phase 3C and Phase 3D occurring during Year 2014 construction. Maximum localized emissions for all pollutants occur during Phase 2*

Source: PCR Services Corporation, 2006

of activity, the model predicts that one day out of 365 days an off-site PM_{10} concentration could be as high as 35.6 µg/m^3.

Actual construction activities on average would typically operate at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled predicted set of conservative assumptions likely overstates the potential localized impacts, but is still concluded to remain significant and unavoidable even with incorporation of all feasible mitigation measures.

Table IV.B-10

**Mitigated Project-Related Local Construction Emissions
(pounds per day)**

	CO	NOx	PM_{10}[a]	$PM_{2.5}$[a]	VOC	SOx
Phase 1 (New Library and Technology Center)	114	81	8	3	24	<1
Phase 2 (New Middle and Upper School Main Academic Building and Parking Facility)	213	152	26	7	35	<1
Phase 3A (New Academic Building West)	107	78	2	1	13	<1
Phase 3B (Addition and Renovation of Existing Academic Building South)	107	78	3	2	15	<1
Phase 3C (Disney Pavilion Renovation)	105	78	2	1	26	<1
Phase 3C (New Outdoor Aquatic Center)	112	80	3	2	13	<1
Phase 3D (Lower School Renovations)	44	33	1	1	13	<1
Max Overlapping[b]	264	190	26	7	35	<1
LST Threshold (5 acre site with 25 meter receptor distance)[c]	994	262	13	13	-	-
Over/(Under)	(730)	(72)	13	(6)	-	-
Exceed Threshold?	No	No	**Yes**	No	No	No

[a] *$PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[b] *Maximum localized CO and NOx emissions occur during combined Phase 3B, Phase 3C and Phase 3D occurring during Year 2014 construction. Maximum localized $PM_{2.5}$ and VOC emissions occur during Phase 2.*

[c] *The project site is located in SCAQMD Source Receptor Area (SRA) No. 7. These LSTs are based the site location SRA and project area that could be under construction on any given day. In regard to the LST look-up tables, the analysis assumed a five-acre site with a 25 meter receptor distance.*

Source: PCR Services Corporation, 2006

Db. Operation

During the operational phase, the project would not result in regional emissions that exceed SCAQMD significance thresholds for CO, NO_X, PM_{10}, and VOC. Project traffic during the operational phase of the project would not cause an exceedance of the State or federal standards and no significant impacts to local CO concentrations would occur. The project would also not result in any localized impacts related to air toxic emissions as the School is limited to small sources of air toxic emissions (e.g., consumer products and diesel particulates from school buses) and no substantial sources of air toxic emissions are near the School that could significantly impact sensitive receptors at or near the project site. The project does not include any uses identified by the SCAQMD as being associated with odors and as such would have no impact related to objectionable odors. In addition, the project is consistent with adopted air quality plans and polices and would not have a significant cumulative impact on air quality. Therefore, operation of the project following construction would not have a significant and unavoidable impact on air quality.

This section provides a discussion of the existing biological resources within the project vicinity and an analysis of potential impacts to biological resources from implementation of the proposed project. The scope of this assessment encompasses the field surveys and documentation of existing biological resources on the project site with particular attention to sensitive species, jurisdictional areas, and regulated trees. A general biological survey, which included the mapping of plant communities, and a jurisdictional delineation were conducted by PCR over the entire project site. A tree survey was conducted by PCR in the vicinity of the areas of the site to be developed including a 20-foot buffer area.

1. ENVIRONMENTAL SETTING

a. Existing Conditions

The project site is located in the north-facing foothills of the eastern portion of the Santa Monica Mountains. The majority of the project site is currently developed. Existing development on site consists of school buildings, roads, parking lots, an athletic field, and other associated campus facilities. Native woodland vegetation supporting coast live oak trees and southern California black walnut trees is located on the slopes in the southern and eastern portions of the project site. Surrounding land use includes residential development to the north and west, open space immediately to the south, and an open space ridge immediately to the east. The project site is gently sloping to the south and the elevation ranges from approximately 750 feet above mean sea level (msl) in the northern portion of the project site to approximately 900 feet above msl in the southern portion of the project site.

(1) Plant Communities

Plant communities were mapped by PCR biologists with the aid of a 1”=150’ scale aerial photograph and topographic map. Plant community boundaries were delineated directly onto the aerial photograph while in the field. The topographic map was used as a guide for interpretation of topographic features. Plant communities were then digitized using Geographic Information System (GIS) technology to calculate acreage. Plant community names and hierarchical structure follows the California Department of Fish and Game List of California Terrestrial

Natural Communities Recognized by the Natural Diversity Data Base.[92] Plant community descriptions were based on PCR findings and descriptions contained in Sawyer and Keeler-Wolfe[93] and Holland.[94] A summary of the plant communities mapped on site is included in Table IV.C-1, *Plant Communities*, on page 178 and their locations are depicted in Figure IV.C-1, *Plant Communities,* on page 179.

The majority of the approximately 18.3-acre project site consists of The Buckley School facilities and has been mapped as developed (11.7 acres). Developed areas consist of the campus buildings, roads, parking lots, athletic field and all associated campus facilities. Very little to no native vegetation occurs within the developed areas; the majority of the vegetation consists of ornamental species that have been planted.

The slopes surrounding the developed areas within the project site are dominated by California walnut-coast live oak woodland totaling approximately 4.9 acres. This community conforms to Sawyer and Keeler-Wolf's description of California walnut series and to descriptions contained in Holland for walnut woodland and coast live oak woodland. Dominant species found in this community within the study area include California walnut (*Juglans californica* var. *californica*) and coast live oak (*Quercus agrifolia*) in the tree canopy; scrub oak (*Q. berberidifolia*), toyon (*Heteromeles arbutifolia*), Mexican elderberry (*Sambucus mexicana*), sugarbush (*Rhus ovata*), and lemonadeberry (*R. integrifolia*) in the shrub layer; and an understory consisting of leaf litter, black mustard (*Brassica nigra*), brome grasses (*Bromus madritensis* ssp. *rubens* and *B. diandrus*), fuchsia-flowered gooseberry (*Ribes speciosum*), phacelia (*Phacelia* sp.), and giant wild rye (*Leymus condensatus*). The canopy cover ranges from 70-90 percent cover. In general, the community appears to be very mature and the understory is very open.

One area in the western portion of the study area on the slope within Buckley School property west of the athletic field was mapped as California walnut-coast live oak woodland/ornamental (approximately 0.6 acre) due to the scattered ornamental species that have been planted on school grounds within portions of native habitat.

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[92] *Department of Fish and Game. Wildlife and Habitat Data Analysis Branch. The Vegetation Classification and Mapping Program. September 2003. List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database.*

[93] *Sawyer, John O. and T. Keeler-Wolf. 1995. A Manual of California Vegetation. Sacramento: California Native Plant Society.*

[94] *Holland, R. F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California Resources Agency. Department of Fish and Game. Non-Game Heritage Program. Sacramento, California.*

Table IV.C-1

Plant Communities

Plant Community Name/Land Cover Type	Acres On Site
Developed	11.7
California Walnut-Coast Live Oak Woodland	4.9
California Walnut-Coast Live Oak Woodland/Ornamental	0.6
Ornamental	1.0
Non-native Grassland	0.1
Coast Goldenbush Grassland	<0.1
Coyote Brush Scrub	<0.1
Total	**18.3**

Source: PCR Services Corporation, 2006.

Ornamental landscaping, totaling approximately 1.0 acres, within The Buckley School property have also been identified. These areas are dominated by a variety of non-native plantings, which are used for fuel modification and aesthetic purposes within the campus setting.

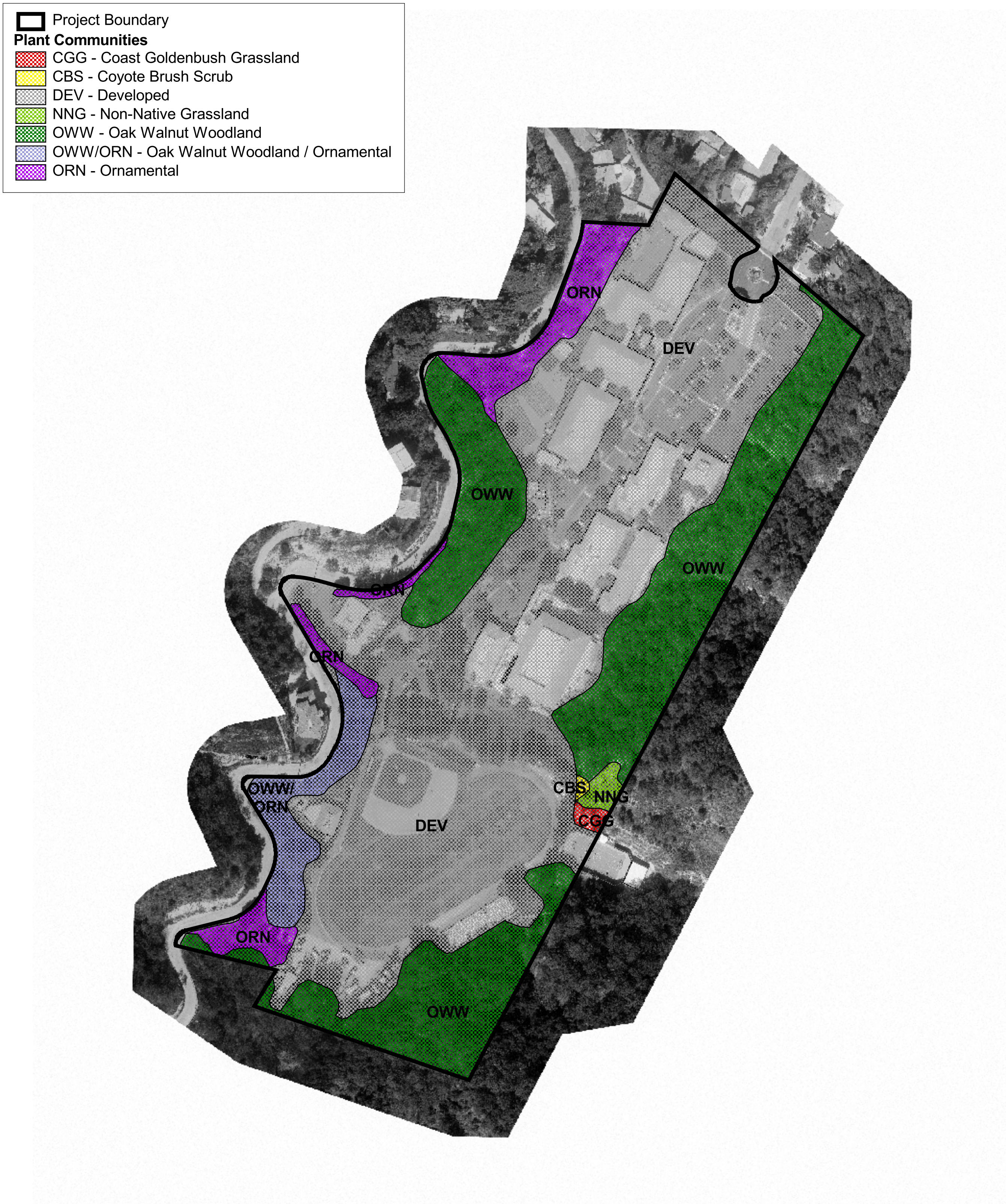
One area in the eastern portion of the property in the hills above the basketball court and weight room was mapped as non-native grassland. This area appears to have been disturbed in the past due to the absence of California walnut and coast live oak trees which surround it. Dominant species observed include black mustard and a variety of annual grasses. This area totals approximately 0.1 acre.

Coast goldenbush grassland has been mapped in one area on a steep, cliff-like slope just north of the basketball court and weight room. This area is dominated by non-native grasses, black mustard, and phacelia with scattered coast golden bush (*Isocoma menziesii*) shrubs throughout. Also present is California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), and California fuchsia (*Epilobium canum*). This community totals less than 0.1 acre.

A dense stand of coyote brush (*Baccharis pilularis*) has been mapped as coyote brush scrub west of the athletic field and north of the basketball court at the toe of the slope. This area totals less than 0.1 acre.

(2) Wildlife

The plant communities discussed above provide wildlife habitat. While a few wildlife species are entirely dependent on a single natural community, the entire mosaic of all the natural communities within the study area and adjoining areas constitutes a functional ecosystem



Source: Don Read Corp. (Aerial), Feb. 6, 2003; PCR Services Corporation, 2006.

PCR

Figure IV.C-1
Buckley School
Plant Communities

for a variety of wildlife species, both within the study area and as part of the regional ecosystem. Following are discussions of wildlife populations on the site, segregated by taxonomic group. Representative examples of each taxonomic group either observed or expected on the project site are provided. Sensitive wildlife species occurring or potentially occurring within the area are discussed in greater detail below.

Amphibians

The potential presence of amphibians varies greatly between habitats within the study area. Terrestrial species may or may not require standing water for reproduction. Terrestrial species avoid desiccation by burrowing underground; within crevices in trees, rocks, and logs; and under stones and surface litter during the day and dry seasons. Due to their secretive nature, terrestrial amphibians are rarely observed, but may be quite abundant if conditions are favorable. Aquatic amphibians are dependent on standing or flowing water for reproduction. Such habitats include fresh water marshes and open water (reservoirs, permanent and temporary pools and ponds, and perennial streams). Many aquatic amphibians will utilize vernal pools as nesting sites. These pools are temporary in duration and form following winter and spring rains common to southern California. No amphibian species were observed during surveys on site; however, the project site has the potential to support common amphibian species such as Pacific tree frog (*Hyla regilla*) and California toad (*Bufo boreas halophilus*) in the leaf litter of the California walnut-coast live oak woodland and within natural drainage features.

Reptiles

Reptilian diversity and abundance typically varies with habitat type and character. Some species prefer only one or two natural communities; however, most will forage in a variety of communities. A number of reptile species prefer open habitats that allow free movement and high visibility. Most species occurring in open habitats rely on the presence of small mammal burrows for cover and escape from predators and extreme weather. No reptiles were observed during surveys conducted on site; however, the project site has many essential reptilian habitat characteristics and possesses the potential to support a variety of species. Reptile species expected to occur on site include western fence lizard (*Sceloporus occidentalis*), side-blotch lizard (*Uta stansburiana*), and San Diego gopher snake (*Pituophis catenifer annectens*). Sensitive reptile species potentially occurring on the site are discussed in more detail below.

Avifauna

The woodland habitat and ornamental landscaping provide foraging and cover habitat for year-round residents, seasonal residents, and migrating song birds. Avian species observed on site include mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), acorn woodpecker (*Melanerpes formicivorus*), Nuttall's woodpecker (*Picoides nuttallii*), black phoebe

(*Sayornis nigricans*), western scrub jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), common raven (*C. corax*), oak titmouse (*Baeolophus inornatus*), Bewick's wren (*Thryomanes bewickii*), blue-gray gnatcatcher (*Polioptila caerulea*), yellow-rumped warbler (*Dendroica coronata*), California towhee (*Pipilo crissalis*), and bushtit (*Psaltriparus minimus*). Sensitive avian species potentially occurring on the site are discussed below.

Much of the habitat within the project site provides foraging opportunities and breeding areas for raptors. Trees found throughout the site provide perches for foraging and may provide nesting sites. Raptor species observed during surveys include red-tailed hawk (*Buteo jamaicensis*). Other raptor species expected to occur include Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*A. striatus*), and red-shouldered hawk (*Buteo lineatus*). Sensitive raptor species potentially occurring within the area are discussed below.

Mammals

Much of The Buckley School project site is habitat for mammals, even the insides or beneath portions of the existing buildings. Non-native species such as Virginia opossum (*Didelphis virginiana*), Norway rat (*Rattus norvegicus*), and house mouse (*Mus musculus*) are adapted to human habitation and may occur within and around buildings. Native species, including striped skunk (*Mephitus mephitus*), western gray squirrel (*Sciurus griseus*), Botta's pocket gopher (*Thomomys bottae*), raccoon (*Procyon lotor*), and coyote (*Canis latrans*) are opportunistic and also are expected in association with developed areas. Several species of bats occurring in the region may be attracted to lights of the school, particularly the athletic field, and may utilize these areas for insect foraging. California ground squirrel (*Spermophilus beechyi*) and mule deer (*Odocoileus hemionus*) were observed on site. Sensitive mammal species potentially occurring within the area are discussed below.

(3) Wildlife Corridors

As indicated above, the project site is located in the Santa Monica Mountains. A management goal for the maintenance of wildlife resources in the Santa Monica Mountains is the protection of habitat linkages, potential movement zones, or corridors for wildlife. Given an open space area that is both large enough to maintain viable populations of species and provide a variety of travel routes (canyons, ridgelines, trails, riverbeds, and others), wildlife will use these "local" routes while searching for food, water, shelter, and mates, and will not need to cross into other large open space areas. Once open space areas become constrained and/or fragmented as a result of urban development or construction of physical obstacles such as roads and highways, remaining landscape features or travel routes that connect the larger open space areas can become corridors as long as they provide adequate space, cover, food, and water, and do not contain obstacles or distractions (e.g., man-made noise) that would generally hinder wildlife movement. These corridors will foster "regional" wildlife movement from one core habitat area to another core habitat area.

Wildlife movement on a smaller or "local" scale occurs in and around the project site due to the location of the project site adjacent to native habitat areas. The open space, native habitat areas in the vicinity of the site are likely utilized by a variety of wildlife species from many taxonomic groups (i.e., insects, amphibians, reptiles, birds, and mammals). Wildlife use is evident on-site due to the presence of game trails and mule deer sign on the slopes and observation by school personnel of mule deer utilizing the athletic field. Regional wildlife movement does not likely occur on-site. Animals traveling south from open space areas of the Santa Monica Mountains are eventually impeded by dense urban development of the San Fernando Valley. Likely, the project site and open space areas surrounding the project site, comprise the northernmost extent of regional wildlife movement in terms of more secretive species and large mammals (i.e., mule deer, gray fox, bobcat, mountain lion). However, the project site and surrounding development are likely utilized by more ubiquitous species such as coyote, striped skunk, raccoon, and Virginia opossum.

(4) Jurisdictional Wetlands and "Waters of the U.S."

Potential and/or historic drainages and aquatic features were initially located based on a review of historic aerial photographs, a detailed topographic map (1"= 200' scale), the 7.5' U.S. Geological Survey (USGS) Van Nuys topographic quadrangle map, and the Soil Survey of Los Angeles County. An aerial photograph and a topographic map were used to map on-site drainages and riparian vegetation. The entire project site was evaluated and all areas that were identified as being potentially subject to the jurisdiction of the U.S. Army Corps of Engineers (ACOE) and California Department of Fish and Game (CDFG) were field verified by PCR biologists. Non-wetland waters subject to ACOE and CDFG jurisdiction were delineated. The ACOE generally takes jurisdiction within rivers and streams to the ordinary high water mark (OHWM) in accordance with Section 404 of the Clean Water Act (CWA). The CDFG takes jurisdiction from the bank of the stream/channels or to the limit of the adjacent riparian vegetation, both of which are determined by erosion, the deposition of vegetation or debris, and changes in vegetation under Section 1600 et seq. of the California Fish and Game Code. The Regional Water Quality Control Board (RWQCB) also regulates these areas under Section 401 of the CWA and the State Porter-Cologne Act. If any of these criteria were met, a series of transects were run to determine the extent of jurisdictional "Waters of the U.S." and "Waters of the State."

One soil association is mapped within the study on the Los Angeles County soil survey,[95] Tujunga-Soboba association, 0-5 percent slopes. This soil survey provides a very coarse mapping of the soils within the County and is suitable for general planning purposes only. The soils mapped in the soil survey may contain inclusions of other soil types. Tujunga-Soboba soils typically occur on gently sloping or nearly level alluvial fans. Both Tujunga and Soboba soils are very well drained and permeable. These soils are often used for residential development, recreational purposes, and grazing but also can provide wildlife habitat.

Results from the field investigation identified two ephemeral drainage features on-site totaling approximately 157 linear feet of jurisdictional streambed. This includes approximately 0.01 acre of ACOE/RWQCB jurisdictional "Waters of the U.S." and "Waters of the State," and 0.26 acre of CDFG jurisdictional streambed and associated riparian habitat (Figure IV.C-2, *Jurisdictional Drainages,* on page 184). The extent of jurisdictional drainages on-site is summarized in Table IV.C-2, *Jurisdictional Drainage Features,* on page 185. Drainage B, which is located off-site, extends less than five feet in length and supports less than 0.01 acre of ACOE/RWQCB and CDFG jurisdiction and therefore does not contribute acreage to the total. A larger portion of this drainage has been characterized as an atypical condition. This reach does not exhibit an OHWM and shows evidence of disturbance. As a result, the last 77 linear feet of this drainage downstream are not under the jurisdiction of the regulatory agencies. No areas on the project site qualified as jurisdictional wetlands due to the lack of hydric soils, and in most areas, a lack of dominance by hydrophytic vegetation.

(5) Native Trees

A tree survey was conducted on December 17, 2004, May 3, 2005, and March 14, 2006 by PCR biologist/ISA certified arborist Stephanie Picha and biologist Crysta Dickson. The tree survey was subsequently reviewed by Richard Ibarra, a Registered Consulting Arborist (RCA) certified by the American Society of Consulting Arborists. Details of the methodology and findings of the tree survey can be found in the Tree Survey Report prepared by PCR (May 7, 2006), attached as Appendix D to this EIR.

A total of 224 trees, 98 native and 126 non-native, were assessed within the tree survey area, which includes the area defined by the proposed limits of grading and a 20-foot buffer area. Native trees include 37 coast live oak trees, 59 California black walnut trees, and two California sycamores, as shown in Table IV.C-3, *Tree Inventory,* on page 186. On average, all trees were in fair condition physiologically, structurally, and aesthetically.

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[95] *USDA. 1969. Report and General Soil Map, Los Angeles County, California*

Source: Don Read Corp. (Aerial), Feb. 6, 2003; PCR Services Corporation, 2006.

PCR

Figure IV.C-2
Buckley School
Jurisdictional Drainages

Table IV.C-2

Jurisdictional Drainage Features

Name	Length (feet)	ACOE, CDFG Average Width (feet)	ACOE Jurisdiction (acres)	CDFG Jurisdiction (acres)	Nature
Drainage A	114	2, 17.5	0.005	0.07	Ephemeral
Drainage B (off-site, not in total)	5	2, 2	<0.01	<0.01	Ephemeral
Drainage C	43	4, 50	0.004	0.071	Ephemeral
Total	**157**		**0.01**	**0.14**	

Source: PCR Services Corporation, 2006.

A total of 11 of the 37 coast live oak trees assessed within the tree survey area are considered in good overall condition. Five of the 59 California black walnut trees were in overall good condition, and both California sycamores were in fair condition. Of the 126 non-native ornamental trees scattered throughout the tree survey area, the majority within the tree survey area are in fair overall condition, with some structural deformities, while 22 were found to be in good overall condition.

(6) Sensitive Biological Resources

The following discussion describes the plant and wildlife species present, or potentially present, within the study area that have been afforded special recognition by Federal, State, or local resource conservation agencies and organizations, principally due to the species' declining or limited population sizes, usually resulting from habitat loss. Also discussed are habitats that are unique, of relatively limited distribution, or of particular value to wildlife. Protected sensitive species are classified by either State or Federal resource management agencies, or both, as threatened or endangered, under provisions of the State and Federal Endangered Species Acts.

(a) Sensitive Resource Classification

Federal Protection and Classifications

The Federal Endangered Species Act of 1973 (FESA) defines an Endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as "any species which is likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range." Under provisions of Section 9(a)(1)(B) of the FESA it is unlawful to "take" any listed species. "Take" is defined in Section 3(18) of FESA: "...harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Further, the U.S. Fish and

Table IV.C-3

Tree Inventory

Scientific Name	Common Name	Quantity
Native Trees		
Juglans californica	California Walnut	59
Platanus racemosa	California sycamore	2
Quercus agrifolia	Coast live oak	37
Subtotal – Native Trees		*98*
Non-native Trees		
Eucalyptus globulus	Bluegum Eucalyptus	4
Ficus sp.	Fig	3
Fraxinus sp.	Ash	2
Gleditsia sp.	Honeylocust tree	1
Jacaranda mimosifolia	Jacaranda	13
Liquidamber styraciflua	Sweetgum	2
Magnolia grandiflora	Southern Magnolia tree	4
Melaleuca quinquenervia	Cajeput tree	1
Olea europea	Olive	6
Persea americana	Avocado tree	1
Pinus sp.	Pine	27
Pittosporum sp.	Pittosporum tree	5
Podocarpus sp.	Fern pine	5
Prunus sp.	Cherry and Plum trees	4
Robinia sp.	Locust	1
Salix sp.	Willow	3
Sapindus saponaria	Wingleaf soapberry	17
Schinus molle	Pepper tree	1
Ulmus chinensis	Chinese elm	7
Unknown ornamental species	Unknown ornamental	19
Subtotal – Non-native Trees		*126*
TOTAL		**224**

Source: PCR Services Corporation, 2006.

Wildlife Service (USFWS), through regulation, has interpreted the terms "harm" and "harass" to include certain types of habitat modification as forms of "take." These interpretations, however, are generally considered and applied on a case-by-case basis and often vary from species to species. In a case where a property owner seeks permission from a Federal agency for an action which could affect a Federally-listed plant and animal species, the property owner and agency are required to consult with USFWS. Section 9(a)(2)(b) of the FESA addresses the protections afforded to listed plants.

Within the last ten years the USFWS instituted changes in the listing status of candidate species abandoning the C1/C2 model. Former C1 candidate species are now considered Federal candidate species (FC). Some USFWS field offices (e.g., Sacramento) maintain lists of

Federal Species of Concern (FSC). These species receive no legal protection and the use of the term does not mean that they will eventually be proposed for listing (http://sacramento.fws.gov/es/spp_concern.htm). The Carlsbad and Ventura Fish and Wildlife Offices do not maintain such a list for their jurisdictions. All references to Federally protected species in this report include the most current published status to which each species has been assigned by USFWS.

For purposes of this assessment the following acronyms are used for Federal status species:

- FE Federally listed as Endangered
- FT Federally listed as Threatened
- FPE Federally proposed for listing as Endangered
- FPT Federally proposed for listing as Threatened
- FPD Federally proposed for delisting
- FC Federal candidate species (former C1 species)

State of California Protection and Classifications

California's Endangered Species Act (CESA) defines an Endangered species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease." The State defines a Threatened species as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an Endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a Threatened species." Candidate species are defined as "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of Endangered species or the list of Threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list." Candidate species may be afforded temporary protection as though they were already listed as Threatened or Endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species.

Article 3, Sections 2080 through 2085, of the CESA addresses the taking of Threatened or Endangered species by stating "No person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided." Under the CESA, "take" is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Exceptions authorized by the state to allow "take" require permits or memoranda of understanding and can be authorized for "Endangered species, Threatened species, or candidate species for scientific, educational, or management purposes." Sections 1901 and 1913 of the California Fish and Game Code provide that notification is required prior to disturbance.

Additionally, some sensitive mammals and birds are protected by the State as Fully Protected Mammals or Fully Protected Birds, as described in the California Fish and Game Code, Sections 4700 and 3511, respectively. California Species of Special Concern are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFG's California Natural Diversity Database (CNDDB) project. Informally listed taxa are not protected per se, but warrant consideration in the preparation of biotic assessments. For some species, the CNDDB is only concerned with specific portions of the life history, such as roosts, rookeries, or nest sites.

For the purposes of this assessment, the following acronyms are used for State status species:

- SE State-listed as Endangered
- ST State-listed as Threatened
- SR State-listed as Rare
- SCE State candidate for listing as Endangered
- SCT State candidate for listing as Threatened
- SFP State Fully Protected
- CSC California Species of Special Concern

California Native Plant Society

The CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. CNPS has compiled an inventory[96] comprised of the information focusing on geographic distribution and qualitative characterization of Rare,

[96] *CNPS. 2001. Inventory of Rare and Endangered Plants of California (sixth edition). Rare Plant Scientific Advisory Committee, David P. Tibor, Convening Editor. California Native Plant Society. Sacramento, CA. x+388pp.*

Threatened, or Endangered vascular plant species of California. The list serves as the candidate list for listing as Threatened and Endangered by CDFG. CNPS has developed five categories of rarity:

- List 1A Presumed extinct in California.
- List 1B Plants Rare, Threatened, or Endangered in California and elsewhere.
- List 2 Plants Rare, Threatened, or Endangered in California, but more common elsewhere.
- List 3 Plants about which we need more information—a review list.
- List 4 Plants of limited distribution—a watch list.

Sensitive species that occur or potentially could occur on the project site are based on one or more of the following: (1) the direct observation of the species on the property during one of the biological surveys; (2) a record reported in the CNDDB; and (3) the project site is within the known distribution of a species and contains appropriate habitat.

(b) Sensitive Plant Communities

California walnut woodland is considered high-priority for inventory community by the CNDDB. A total of 5.5 acres of California walnut woodland occurs on site in varying degrees of disturbance. The 5.5 acres is comprised of 4.9 acres of California walnut-coast live oak woodland, and 0.6 acre California walnut-coast live oak woodland/ornamental.

(c) Sensitive Plant Species

Sensitive plants include those listed, or candidates for listing by USFWS, CDFG, and CNPS (particularly list 1A, 1B, and 2). Several sensitive plant species were reported in the CNDDB for the vicinity. A discussion of each sensitive species observed, as well as those potentially present on the property, is presented in Table IV.C-4, *Buckley Sensitive Plants*, on page 190. One sensitive plant species occurs on site, the southern California walnut. This species is not listed as threatened or endangered by the USFWS or CDFG; it is designated as a watch list species (List 4) by the CNPS. This species is a dominant species in the California walnut-coast live oak woodland plant community on the west- and south-facing slopes ascending from the school.

Table IV.C-4

Buckley Sensitive Plants

VASCULAR PLANTS								
Scientific Name	**Common Name**	**Flowering Period**	**Federal**	**State**	**CNPS List**	**Preferred Habitat**	**Distribution**	**Occurrence On-site**
Berberis nevinii	Nevin's barberry	Mar.-Apr.	FE	SE	1B	Sandy and gravelly places below 2,000 feet. Coastal sage scrub and chaparral.	Known from the Hills south of Loma Linda in San Bernardino County and in the area around Vail Lake in Riverside County.	NE
Calochortus plummerae	Plummer's mariposa lily	May-July	NONE	NONE	1B	Dry, rocky areas in coastal sage scrub, chaparral, meadows and seeps, and yellow pine forest below 1,700 meters (5,000 feet) elevation.	Know from the Santa Monica Mountains and San Jacinto Mountains.	NE
Chorizanthe parryi var. *fernandina*	San Fernando Valley spineflower	Apr.-June	FC	SE	1B	Coastal scrub (sandy); elevation 500-4,000 feet.	Known from Ventura County south to Orange County.	NE
Dudleya multicaulis	Many-stemmed dudleya	Apr.-July	NONE	NONE	1B	Chaparral, coastal scrub, valley and foothill grassland/ often clay; elevation 50-2,600 feet.	Known to occur in Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties.	NE
Juglans californica	California walnut	Mar.-May	NONE	NONE	4	Sage scrub, chaparral, cismontane woodland; often in association with oaks/oak woodland; frequently found on steep hillsides with northern exposures; deep alluvial soils.	Southern California	OB

Table IV.C-4 (Continued)

Buckley Sensitive Plants

VASCULAR PLANTS								
Scientific Name	**Common Name**	**Flowering Period**	**Federal**	**State**	**CNPS List**	**Preferred Habitat**	**Distribution**	**Occurrence On-site**
Malacothamnus davidsonii	Davidson's bush mallow	June-Jan.	NONE	NONE	1B	Chaparral, cismontane woodland, coastal scrub, riparian woodland; elevation 600-2,800 feet.	Known to occur in Monterey, San Luis Obispo, and Los Angeles counties; however, rapid urbanization of L.A. has threatened the population.	NE

Key to Species Listing Status Codes

FE	Federally Listed as Endangered	SE	State Listed as Endangered	SR	State Rare
FT	Federally Listed as Threatened	ST	State Listed as Threatened	CSC	California Special Concern Species
FC	Federal Candidate	SCE	State Candidate for Endangered	SC	State Candidate
		SCT	State Candidate for Threatened		

Key to Occurrence Codes

OB Observed
EX Species expected to occur on-site
NE Species not expected to occur on-site
P Species has potential to occur on-site

California Native Plant Society (CNPS)

List 1A: Presumed extinct in California.
List 1B: Rare, threatened, or endangered throughout their range.
List 2: Rare, threatened, or endangered in California, but more common in other states.
List 3: Plant species for which additional information is needed before rarity can be determined
List 4: Species of limited distribution in California (i.e., naturally rare in the wild), but whose existence does not appear susceptible to threat.

Source: PCR Services Corporation, January 2006.

(d) Sensitive Wildlife Species

Sensitive wildlife includes those species listed as endangered or threatened under FESA or CESA, candidates for listing by USFWS or CDFG, and species of special concern to USFWS or CDFG. A number of sensitive wildlife species from the region were reported in the CNDDB and several sensitive species were observed or are expected to occur on site as indicated in Table IV.C-5, *Buckley Sensitive Wildlife,* on page 193.

(7) Regulatory Framework

(a) Federal Endangered Species Act of 1973, PL 93-205 (16 U.S.C. 1531)

The purpose of the Federal Endangered Species Act is to provide a means whereby the ecosystem upon which endangered species and threatened species rely may be conserved. The Act defines an endangered species as "any species which is in danger of extinction throughout all or a significant portion of its range." A threatened species is defined as "any species which is likely to become an endangered species within the foreseeable future." Under provisions of the Act, it is unlawful to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect" any listed species. Depending on interpretation, a taking could include certain types of habitat modification.

(b) Migratory Bird Treaty Act

The Federal Migratory Bird Treaty Act (MBTA) protects most native bird species from destruction or harm. This protection extends to individuals as well as any part, nest, or eggs of any bird listed as migratory. Most native North American bird species are on the MBTA list.

In practice, Federal permits potentially impacting migratory birds typically have conditions that require pre-disturbance surveys for nesting birds and, in the event nesting is observed, a buffer area with a specified radius would be established, within which no disturbance or intrusion would be allowed until the young had fledged and left the nest. If not otherwise specified in the permit, the size of the buffer area would vary with species and local circumstances (e.g., presence of busy roads), and would be based on the professional judgment of the monitoring biologist.

Table IV.C-5

Buckley Sensitive Wildlife

VERTEBRATES						
Scientific Name	**Common Name**	**Federal**	**State**	**Preferred Habitat**	**Distribution**	**Occurrence On-site** [1]
REPTILES						
Phrynosomatidae	**Iguanid Lizard Family**					
Phrynosoma coronatum (blainvillei)	Coast (San Diego) horned lizard	NONE	CSC	Valley-foothill hardwood, conifer, and riparian habitats, pine-cypress, juniper and annual grassland habitats below 6,000 feet, open country, especially sandy areas, washes, flood plains, and windblown deposits.	Coastal ranges from south Ventura, Los Angeles, San Bernardino cos., Orange, western Riverside and western San Diego cos.	NE
Emydidae	**Box and Water Turtle Family**					
Emys (=Clemmys) marmorata pallida	Southwestern pond turtle	NONE	CSC	Lakes, marshes, rivers, streams, and irrigation ditches with emergent vegetation such as watercress, cattails, or water lilies.	San Francisco Bay south to Baja California and west of the Sierra-Cascade crest.	NE
BIRDS						
Accipitridae	**Hawks, Kites, Harriers and Eagles**					
Accipiter cooperii	Cooper's hawk	NONE	CSC	Open woodlands, especially riparian woodland.	Entire State	P F, N
Accipiter striatus	Sharp-shinned hawk	NONE	CSC	Woodlands; forages over chaparral and other scrublands; prefers riparian habitats and north-facing slopes with plucking perches.	Entire State, although only winters in most of s CA.	P F

Table IV.C-5 (Continued)

Buckley Sensitive Wildlife

VERTEBRATES						
Scientific Name	**Common Name**	**Federal**	**State**	**Preferred Habitat**	**Distribution**	**Occurrence On-site** [1]
Vireonidae	**Vireo Family**					
Vireo bellii pusillus	Least Bell's vireo	FE	SE	Found especially in willow and mesquite thickets near water.	A patchily distributed summer resident across s California.	NE
Sylviidae	**Gnatcatcher Family**					
Polioptila californica californica	Coastal California gnatcatcher	FT	CSC	Coastal sage scrub vegetation below 2,500 feet elevation in Riverside County and generally below 1,000 feet elevation along the coastal slope; generally avoids steep slopes and dense vegetation for nesting.	S Ventura Co., southward through Los Angeles, Orange, Riverside, San Bernardino Cos., and south through the coastal foothills of San Diego Co.	NE

Key to Species Listing Status Codes

FE	Federally Listed as Endangered	SE	State Listed as Endangered
FT	Federally Listed as Threatened	ST	State Listed as Threatened
FPE	Federally Proposed as Endangered	SCE	State Candidate for Endangered
FPT	Federally Proposed as Threatened	SCT	State Candidate for Threatened
FPD	Federally Proposed for Delisting	SR	State Rare
		CSC	California Special Concern Species

Key to Occurrence Codes

OB	Observed	B	Raptors; if present, would utilize the site for both foraging and nesting
EX	Species expected to occur on-site	F	Raptors; if present, would utilize the site for foraging only
NE	Species not expected to occur on-site	N	Raptors; if present, would utilize the site for nesting only
P	Species has potential to occur on-site		

Source: PCR Services Corporation, February 2006.

(c) Army Corps of Engineers (ACOE) Section 404

The ACOE regulates "discharge of dredged or fill material" into "waters of the U.S.," which includes tidal waters, interstate waters, and all other waters that are part of a tributary system to interstate waters or to navigable "waters of the U.S.," the use, degradation, or destruction of which could affect interstate or foreign commerce or which are tributaries to waters subject to the ebb and flow of the tide (33 C.F.R. 328.3(a)), pursuant to provisions of Section 404 of the CWA. The ACOE generally takes jurisdiction within rivers and streams to the "ordinary high water mark" (OHWM) determined by erosion, the deposition of vegetation or debris, and changes in vegetation. The ACOE defines jurisdictional wetlands as areas that contain hydrophytic vegetation, hydric soils, and wetland hydrology, in accordance with the procedures established in the ACOE Wetland Delineation Manual (Environmental Laboratory 1987). However, the United States Supreme Court ruling in the Solid Waste Agency of Northern Cook County vs. United States Army Corps of Engineers, No. 99-1178 (January 9, 2001) ("the SWANCC case"), held that the CWA does not give the federal government regulatory authority over non-navigable, isolated, intrastate waters. As a result of this decision, some previously regulated depressional areas such as mudflats, sandflats, wetlands, prairie potholes, wet meadows, playa lakes, natural ponds, and vernal pools which are not hydrologically connected to other intra- or inter-state "waters of the U.S.," are no longer regulated by the ACOE. However, these areas may still be regulated by CDFG under Fish and Game Code Section 1600 or the RWQCB under the Porter-Cologne Water Quality Control Act. Legislation has been introduced to the State Assembly to revise the Fish and Game Code to specifically regulate isolated waters affected by the SWANCC case.

(d) Regional Water Quality Control Board (RWQCB) Section 401

The RWQCB regulates "discharging waste, or proposing to discharge waste, within any region that could affect the "water of the state" (Water Code § 13260 (a)), pursuant to provisions of the Porter-Cologne Water Quality Control Act. "Waters of the State" are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (Water Code § 13050 (e)). Before the ACOE will issue a CWA Section 404 permit, applicants must receive a CWA Section 401 Water Quality Certification from the RWQCB. If a CWA Section 404 permit is not required for the project, the RWQCB may still require a permit (i.e., Waste Discharge Requirement) under the Porter-Cologne Water Quality Control Act. Applications to the RWQCB must include a complete certified CEQA document.

(e) State of California Fish and Game Code

The California Department of Fish and Game takes jurisdiction to the bank of the stream or to the limit of the adjacent riparian vegetation. Section 1602[88] of the California Fish and Game Code requires any entity (e.g., person, State or local government agency, or public utility) who proposes a project that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, to notify CDFG of the proposed project. In the course of this notification process, the CDFG will review the proposed project as it affects streambed habitats within the project site. The CDFG may then place conditions on the Section 1602 clearance to avoid, minimize, and mitigate the potentially significant adverse impacts within CDFG jurisdictional limits.

In addition, Section 3503 of the California Fish and Game Code states that, "it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto."

(f) California Endangered Species Act, Fish and Game Code, Division 3, Chapter 1.5

The California Endangered Species Act provides for a State list of endangered and threatened species by the Fish and Game Commission and restricts activities that may impact these species. The Act defines an endangered species as, "a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease."

(g) City of Los Angeles Protected Tree Ordinance

The City's Protected Tree Ordinance regulates the relocation or removal of all native oak trees (excluding scrub oak), California black walnut trees, California sycamore trees, and California Bay trees of at least four inches in diameter at breast height (DBH). These tree species are defined as "protected" by the City of Los Angeles. The Ordinance prohibits, without a permit, the removal of any regulated protected tree including "acts which inflict damage upon root systems or other parts of the tree..." and requires that all regulated protected trees that are

[88] *Senate Bill No. 418, approved by the Governor October 8, 2003, includes revisions to the Streambed Alteration Agreement process.*

removed be replaced on at least a two-to-one basis with trees that are of a protected variety. Replacement trees must be at least 15 gallons or larger, measure one inch or more in diameter at a foot above the base, and measure at least seven feet in height from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced. The City also requires that a report be prepared by a tree expert discussing the subject tree(s), their preservation, effects of the proposed construction, and mitigation measures pursuant to the removal or replacement thereof.

(h) Mulholland Scenic Parkway Specific Plan

Section B.4 of the Specific Plan states that no oak tree (Q*uercus agrifolia*, Q. *lobata*, Q. *virginiana*) shall be removed, cut down, or moved without prior written approval of the Director of Planning. The Director may approve the removal, cutting down or moving of an oak tree after making the following findings:

- The removal, cutting down or moving of an oak tree will not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters.
- The oak tree is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at said location.

2. ENVIRONMENTAL IMPACTS

a. Approach to the Analysis

The following discussion examines the potential impacts to plant and wildlife resources that may occur as a result of implementation of the proposed project. For the purpose of this assessment project-related impacts take two forms, direct and indirect. Direct impacts are considered to be those that involve the loss, modification or disturbance of natural habitats (i.e., vegetation or plant communities), which in turn, directly affect plant and wildlife species dependent on that habitat. Direct impacts also include the destruction of individual plants or wildlife, which is typically the case in species of low mobility (i.e., plants, amphibians, reptiles, and small mammals). The collective loss of individuals in these manners may also directly affect regional population numbers of a species or result in the physical isolation of populations thereby reducing genetic diversity and, hence, population stability.

Indirect impacts are considered to be those that involve the effects of increases in ambient levels of sensory stimuli (e.g., noise, light), unnatural predators (e.g., domestic cats and other non-native animals), and competitors (e.g., exotic plants, non-native animals). Indirect impacts may be associated with the construction and/or eventual habitation/operation of a project; therefore, these impacts may be both short-term and long-term in their duration. These impacts are commonly referred to as “edge effects” and may change the behavioral patterns of wildlife and reduce wildlife diversity and abundance in habitats adjacent to project sites.

The determination of impacts in this analysis is based on both the features of the proposed project and the biological values of the habitat and/or sensitivity of plant and wildlife species. Relevant project features (e.g., limits of grading) were supplied by the project architect. Much of this information was supplied in digital format and impacts were calculated using GIS technology in order to maximize the accuracy of the assessment.

The biological values of resources within, adjacent to, and outside the area to be affected by the project were determined by consideration of several factors. These included the overall size of habitats to be affected, the site’s previous land uses and disturbance history, the site’s surrounding environment and regional context, the on-site biological diversity and abundance, the presence of sensitive and special-status plant and wildlife species, the site’s importance to regional populations of these species, and the degree to which on-site habitats are limited or restricted in distribution on a regional basis and, therefore, are considered sensitive in themselves. Whereas this assessment is comprehensive, the focus is on sensitive plant communities/habitats, resources that play an important role in the regional biological systems, and special-status species.

b. Thresholds of Significance

The following thresholds of significance are applied to the proposed project as set forth in the City of Los Angeles’ *CEQA Thresholds Guide*, which states that a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species;
- The alteration of an existing wetland habitat; or

- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light), to a degree that may diminish the chances for long-term survival of a sensitive species.

c. Analysis of Project Impacts

(1) Biological Resources

The proposed project would generally be constructed within areas that are currently developed and/or landscaped as shown in Figure IV.C-3, *Impacts to Plant Communities,* on page 200. Based on the review of relevant literature, the review of data on sensitive habitats and species in the region (e.g., CNDDB), the presence of a limited amount native vegetation within the area to be developed (0.22 acre of California walnut-coast live oak woodland, 0.02 acre of coast goldenbush grassland, and less than 0.01 acre of coyote brush scrub), the location of proposed development within currently developed areas, and the abundance of non-native ornamental landscaping, the project would not result in the loss of individuals, or the reduction of existing habitat, of a local, State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern. In addition, given the general lack of sensitive species on the project site and the existing developed nature of the site, the proposed project would not interfere with habitat use (directly or indirectly) such that normal species' behaviors are disturbed to the degree that may diminish the chances for long-term survival of a sensitive species. Thus, such impacts would be less than significant.

During the site visits, PCR biologists examined the project site for evidence of streams and an ordinary high water mark (OHWM), saturation, an or wetland vegetation. Three drainages were found within the immediate vicinity of the site that would be considered under the jurisdiction of the ACOE and CDFG. These areas support 0.01 acre of ACOE "Waters of the U.S." and 0.14 acre of CDFG "Waters of the State" but do not support wetlands. Construction of the proposed project would not extend over any of the ACOE jurisdictional "waters of the U.S." or the CDFG jurisdictional streambed and associated riparian habitat. Therefore, no impacts to these jurisdictional waters would occur. No wetlands were observed on site, therefore no impacts will occur to wetland habitat (refer to Figure IV.C-4, *Impacts to Jurisdictional Drainages,* on page 201).

Due to the presence of large trees within and adjacent to the project site, nesting birds may be present and subject to impacts from construction activities. Impacts to nesting birds are potentially significant as these species are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. A mitigation measure is provided below to ensure that potential impacts to nesting birds would be less than significant.

Based on the above discussion, implementation of the proposed project site would not result in significant impacts to biological resources.

PCR

Source: Don Read Corp. (Aerial), Feb. 6, 2003; PCR Services Corporation, 2006.

Figure IV.C-3
Buckley School Impacts to Plant Communities

Figure IV.C-4
Buckley School
Impacts to Jurisdictional Drainages

Source: Don Read Corp. (Aerial), Feb. 6, 2003; PCR Services Corporation, 2006.

(2) Wildlife Corridors

The project site occurs within an area that supports local wildlife movement for more ubiquitous, development-adapted species and is known to support mule deer on the slopes in the eastern and southern portions of the project site. These species likely utilize the native habitat for foraging and for cover. However, the project site would not support regional north-south or east-west movement between larger habitat areas due to the presence of dense urban development north of the project site and residential development east and west of the project site. Furthermore, since the proposed project is occurring within already developed areas of the current campus, the proposed project is not expected to interfere with wildlife movement or migration corridors such that the chances for long-term survival of any species, sensitive or otherwise, would be diminished. Thus, potential impacts to wildlife corridors would be less than significant.

(3) Protected Trees

A total of 57 trees will be directly impacted by the proposed project as detailed in Table IV.C-6, *Tree Impacts,* on page 203 and shown in Figure IV.C-5, *Tree Impacts,* on page 205. These trees would require removal and include up to 18 native trees (4 coast live oak trees, and 14 California walnut trees) and 39 non-native trees. None of the 57 trees proposed for removal are recommended for transplanting. A total of 44 trees will be partially impacted by the proposed project, including 20 native trees (5 coast live oak trees, 13 California walnut trees, and 2 California sycamore tree) and 24 non-native trees.[89,90] These trees would not be removed, but may require protective measures during construction. An additional 26 trees, as detailed in the Tree Survey Report, would also potentially be impacted but not to a point that the tree would need to be removed. These include 11 native trees (7 coast live oak and 4 California walnut trees) and 15 non-native trees. As discussed in the Tree Survey Report, 49 native trees within the survey area and 48 non-native trees within the survey area would be avoided by the proposed improvements. The mitigation measures provided below will ensure that the 70 partially and potentially impacted trees are protected during construction. With implementation of the mitigation measures provided below, impacts to protected trees would be reduced to less than significant levels.

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[89] *Partially impacted trees include trees which may be impacted within the 5' buffer zone of the tree canopy.*

[90] *Fewer trees would be impacted if the Aquatic Center is developed at the current outdoor basketball and weight facility located at the northeast corner of the athletic field.*

Table IV.C-6

Impacts to Trees

Tree Species	Survey Year	Directly Impacted [a]	Partially Impacted [b]	Potentially Impacted [c]	Avoided [d]
Native Trees					
Walnut (*Juglans)*	2004	1	1	1	10
	2005	4	1	3	17
	2006	9	11	0	1
Oak (*Quercus*)	2004	3	1	4	4
	2005	1	1	1	16
	2006	0	3	2	1
Sycamore (*Platanus*)	2004	0	2	0	0
	2005	0	0	0	0
	2006	0	0	0	0
Sub-Total		*18*	*20*	*11*	*49*
Non-Native Trees					
Ornamental	2004	25	14	10	19
	2005	14	10	5	29
	2006	0	0	0	0
Sub-Total		*39*	*24*	*15*	*48*
Total		**57**	**44**	**26**	**97**

[a] *Impacted trees are proposed for removal due to the proposed development.*
[b] *Partially impacted trees include trees which may be impacted within the 5' buffer zone of the tree canopy. These trees would not be removed, but may require protective measures during construction.*
[c] *For potentially impacted trees, removal would not be necessary with proper pre-construction protection measures (see Section 5.0, Recommendations and Mitigation Measures).*
[d] *Avoided trees would not be removed.*

Source: PCR Services Corporation, 2006.

(4) Nesting Birds

The study area supports many trees which could be used by breeding raptors and songbirds. Nesting activity typically occurs from February 15 to August 31. To protect nesting birds regulated by the MBTA, efforts will be made to schedule all removals between September 1 and February 14 to avoid the nesting season. If activities will occur during the nesting season, all suitable habitat will be thoroughly surveyed for the presence of nesting birds by a qualified biologist prior to removal. If any active nests are detected, the area will be flagged, along with a minimum 50-foot buffer (buffer may range between 50 and 300 feet as determined by the monitoring biologist), and will be avoided until the nesting cycle is complete or it is determined by the monitoring biologist that the nest has failed.

3. CUMULATIVE IMPACTS

The related projects listed in Section III, Environmental Setting, of this EIR would generally consist of infill development. Therefore, biological resources would not be impacted to a measurable degree, as such work would largely occur on previously disturbed land. Related projects would be analyzed on a case-by-case basis for their impacts to native trees, including oak trees, pursuant to City of Los Angeles Protected Tree Ordinance. Thus, no significant cumulative impact to biological resources would occur.

4. MITIGATION MEASURES

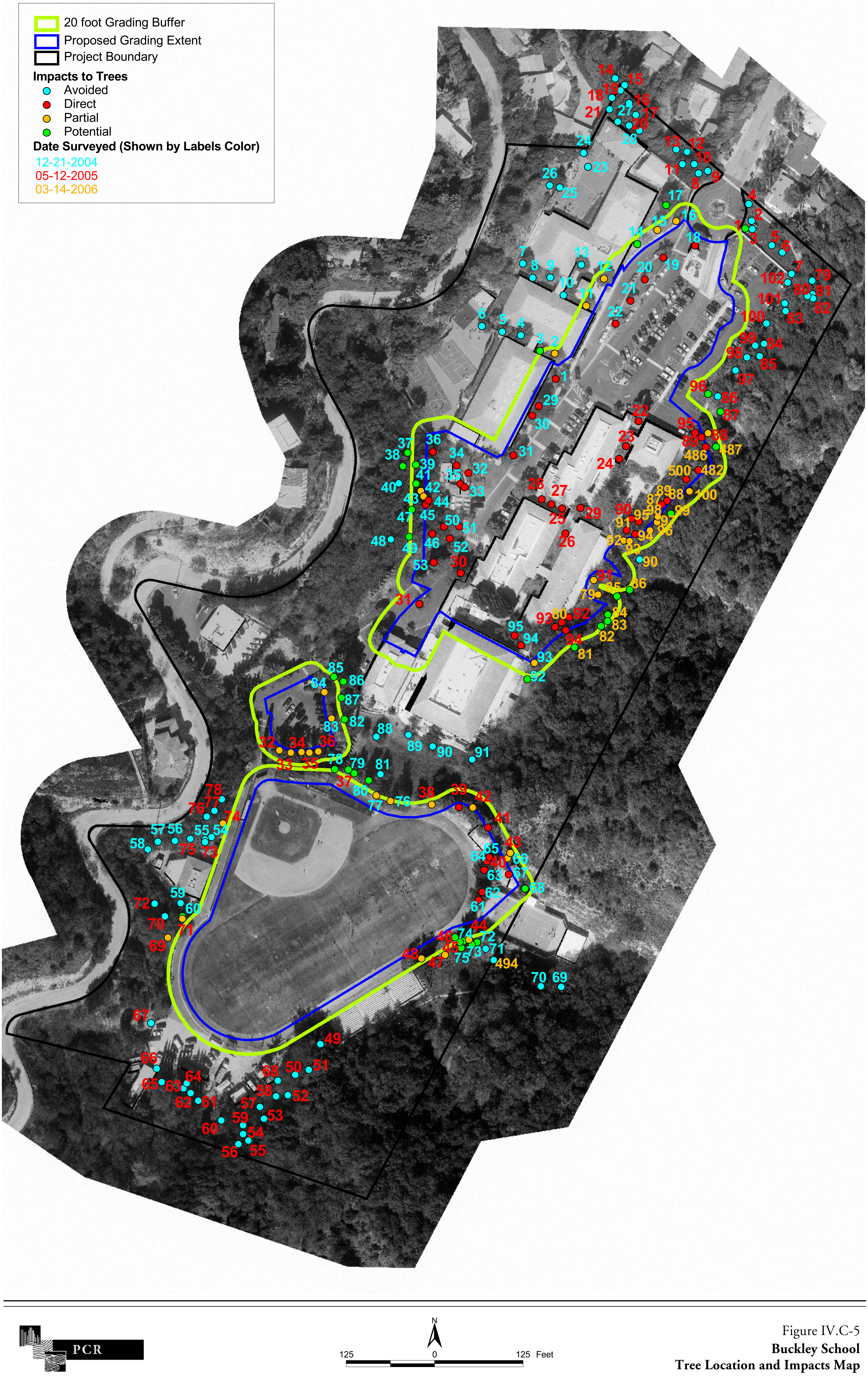
The following mitigation measures are recommended by PCR to reduce potential impacts associated with native trees and migratory birds to less than significant levels:

Mitigation Measure C-1: Trees removed that are protected by the City of Los Angeles Protected Tree Ordinance shall be replaced within the property by at least two trees of a protected variety including valley and coast live oak, or any other tree of the quercus genus (excluding scrub oak), the California Walnut, the California sycamore, and the California bay. Each replacement tree shall be a 15-gallon, or larger specimen in size, measuring one inch or more in diameter at a point one foot above the base, and not less than seven feet in height measured from the base. The size and number of replacement trees shall approximate the value of the tree to be replaced.

Mitigation Measure C-2: All construction work potentially impacting any protected tree shall be approved by, performed under the supervision of, and inspected by a tree expert as defined by the City of Los Angeles Protected Tree Ordinance. This tree expert shall also oversee all maintenance work on the protected trees including irrigation, pruning and spraying.

Mitigation Measure C-3: During construction, the construction supervisor shall ensure that all construction employees are fully informed of the tree protection practices. This shall include information on the tree protection zone, the necessity of preventing damage, and the discussion of work practices that will accomplish such.

Mitigation Measure C-4: During construction, six-foot-high, brightly colored construction fencing shall be erected along the construction side of partially and potentially impacted native trees to delineate the tree protection area. The protective fence shall be installed 5 feet outside of the tree's drip line, if possible. If construction is to occur within the drip line, the fencing shall be installed 12 inches inside the new footing or trenching line.



Source: Don Read Corp. (Aerial), Feb. 6, 2003; PCR Services Corporation, 2006.

Figure IV.C-5
Buckley School
Tree Location and Impacts Map

Mitigation Measure C-5: Due to some sizeable trees and shrubs occurring within and adjacent to the Site, removal of any large trees and large branching shrubs shall take place outside of the nesting season (February 15-August 31) in accordance with the Migratory Bird Treaty Act (MBTA). If such removal activities must occur during the nesting season, a biological monitor shall be present during the removal activities to ensure that no active nests will be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) shall be established until the fledglings have left the nest or it has been determined that the nest has failed.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With incorporation of the mitigation measures outlined above, no significant impacts to biological resources would occur as a result of the proposed project.

IV. ENVIRONMENTAL IMPACT ANALYSIS
D. CULTURAL RESOURCES

The following analysis of cultural resources addresses the potential for the project to adversely impact paleontological resources. This analysis is based in part on information contained within the paleontological records search for the project site and surrounding area conducted by the Natural History Museum of Los Angeles County in August 2003 for PCR Services Corporation (PCR). This records search is included as Appendix E of this EIR.

As further described in the Initial Study included in Appendix E of this EIR, analysis of archaeological and historic resources is not included in this section. After a review of the prehistoric and historic records search response prepared by the South Central Coast Information Center at California State University Fullerton in August 2003 and an assessment of historic records and maps, along with a survey of the project site by qualified cultural resources specialists, it was determined that no unique archaeological resources or historical resources, as defined by the CEQA, are located within the project site.

1. ENVIRONMENTAL SETTING

a. Background and Existing Conditions

Paleontology is a branch of geology that studies the life forms of the past, especially prehistoric life forms, through the review of plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. As defined in this section, paleontological resources are the fossilized remains or traces of multi-cellular animals and multi-cellular plants, including their imprints from a previous geologic period. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the fossil remains, but also the collecting localities and the geologic formations containing those localities.

The existing Buckley School campus is located within a canyon on the north side of the Santa Monica Mountains. It is surrounded on the north and west by residential development and to the east and south by Fossil Ridge Park, owned by the Santa Monica Mountains Conservancy (SMMC). As implied by its name, the park is known to contain paleontological resources.

The project site is generally mantled by shallow imported fill and alluvial soils over bedrock of the Late Miocene Modelo Formation (also known as the Monterey Formation in the area). The Late Miocene Modelo Formation bedrock is composed generally of well-bedded diatomaceous siltstone, with shale and sandstone units. The bedrock is exposed on cut slopes along Camino de la Cumbre, with natural outcrops within the school property. The topography of the project site consists of natural ascending slopes.

In general, areas of the project site proposed for development have been previously disturbed through grading and development. The site has been filled with both compacted and uncompacted imported soils placed over alluvium and bedrock. The thickness of the fill ranges throughout the site from less than 20 feet up to 43 feet of fill beneath the athletic field. Further discussion of the paleontological resources identified within the project area is provided below.

b. Regulatory Framework

(1) Federal Level

A variety of federal statutes specifically address paleontological resources. They are generally applicable to a project if that project includes federally owned or managed lands or involves a federal agency license, permit, approval, or funding. Federal legislative protection for paleontological resources stems from the Antiquities Act of 1906 (PL 59-209; 16 United States Code 431 *et. seq.*; 34 Stat. 225), which calls for protection of historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest on federal lands. Since the proposed project is on privately owned land, this federal statute is not applicable.[100]

(2) State Level

Paleontological resources are also afforded protection by environmental legislation set forth under CEQA. Appendix G (Part V) of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, stating that a project will normally result in a significant impact on the environment if it will "…disrupt or adversely affect a paleontologic resource or site or unique geologic feature, except as part of a scientific study." Section 5097.5 of the Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for the damage or removal of paleontological resources.

[100] *Additionally, this federal statute would not be applicable if the proposed Aquatic Center were built on the portion of publicly owned SMMC land currently occupied by the School's basketball and weight training facility.*

(3) Local Level

The City of Los Angeles Conservation Element, Chapter II, Section 3 states that the City has a primary responsibility to protect paleontological sites pursuant to CEQA. As such, the City's policy is to identify and protect significant paleontological sites and/or resources known to exist or identified during land development, demolition or property modification activities. If land development occurs within a potentially significant paleontological area, "the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site." If significant resources are discovered, authorities must be notified and the designated paleontologist may cease construction activity in that portion of the project site. This cessation allows time for the assessment, removal or protection of the paleontological resources.[101]

(4) Professional Standards

The Society of Vertebrate Paleontology (SVP) has established standard guidelines that outline acceptable professional practices in the conduct of paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional paleontologists in the nation adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most California state regulatory agencies accept the SVP standard guidelines as a measure of professional practice.

c. Paleontological Resources Identified

The Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (NHMLAC) conducted a records search for previously identified paleontological resources within a one-half mile radius of the project site.[102] Their records revealed that there were no known vertebrate fossil localities within the proposed project site. However, the records search did indicate that within a one-half mile radius of the project site, there are vertebrate fossil localities. The closest localities are immediately along Stansbury Avenue, within areas that contain bedrock material of the marine Late Miocene Modelo Formation; around Hollyvine Avenue east-northeast of the project site; around Camino de la Cumbre southwest of the site; around Davana Road southeast and east-southeast of the site; and between Beverly Ridge Drive and Oakfield Dive west-southwest of the site. These localities produced marine fossil

[101] *City of Los Angeles Conservation Element, Section 3, adopted September 2001.*

[102] *Natural History Museum of Los Angeles County, Vertebrate Paleontology Section, Paleontological Records Search for the proposed 3900 Stansbury Avenue, Sherman Oaks, City of Los Angeles, Los Angeles County: one-half mile radius, Van Nuys Quad 7.5', November 2001, included as Appendix E.*

vertebrates, including an uncommon fossil of a sperm whale. Additionally, fossils of sharks, fishes, and seahorses have been found in the project vicinity. The records search also indicated that while very shallow excavations in the Quaternary Alluvium are unlikely to contain significant vertebrate fossils, excavations below the uppermost layers of the Quaternary Alluvium as well as into the hillsides have a high probability of encountering vertebrate fossils. Therefore, the paleontological sensitivity of the project site, given the bedrock material of the marine Late Miocene Modelo Formation, is considered to be high.

2. ENVIRONMENTAL IMPACTS

a. Methodology

To develop a baseline paleontological resources inventory of the proposed project site and surrounding area and to assess the potential paleontological productivity of each stratigraphic unit present, the published and available unpublished geological and paleontological literature was reviewed. Additionally, stratigraphic and paleontologic inventories were compiled, synthesized, and evaluated by the staff of the NHMLAC. These methods are consistent with the SVP guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

In its standard guidelines for assessment and mitigation of adverse impacts to paleontological resources, the SVP establishes three operational categories of sensitivity of rock units in which fossils occur, as follows:

High Potential. Rock units from which vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a potential for containing significant non-renewable fossilferous resources. These units include, but are not limited to, sedimentary formations and some volcanic formations which contain significant non-renewable paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical; and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than recent, including deposits associated with nests or middens, and areas which may contain new vertebrate deposits, traces, or trackways are also classified as significant.[103] Projects in high potential areas

[103] *The Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Non-Renewable Paleontological Resources: Standard Guidelines (1995).*

are not required to conduct field surveys, but rather are required to undertake specific precautionary measures to avoid impacts to paleontological resources. As the project site is located within an area of high potential for fossil resources, no paleontological field survey was required. Standard precautionary measures are discussed below.

Undetermined Potential. Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossilferous potentials. Field surveys by a qualified paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed.[104]

Low Potential. Reports in the paleontological literature or field surveys by a qualified paleontologist may allow determination that some areas or units have low potentials for yielding significant fossils. Such units will be poorly represented by specimens in institutional collections. These deposits generally will not require protection or salvage operations.[105]

b. Threshold of Significance

At the State level, the threshold of significance is based on Appendix G of the 2006 CEQA Guidelines. For purposes of this EIR, implementation of the proposed project may have a significant adverse impact on paleontological resources if it would result in the following:

- Directly or indirectly destroys a unique paleonotological resource or site or unique geologic feature.

Additionally, the City of Los Angeles CEQA Thresholds Guide (p. M.1-3) states that the determination of the significance of paleontological impacts shall be made on a case-by-case basis, considering the following factors:

1. Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
2. Whether the paleontological resource is of regional or statewide significance.

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[104] *Ibid.*

[105] *Ibid.*

Based on these factors, the project would have a significant impact on paleontological resources if:

- The project would result in the permanent loss of, or loss of access to, a paleontological resource.

At the federal level there are no established standards that define significance thresholds for paleontological resources impacts.

c. Project Features

Implementation of the project would modify certain areas of the site's existing topography. The new project buildings would be generally consolidated within the already developed central areas of the campus. Thus, grading would occur primarily in previously developed or paved areas that have been excavated and graded in the past. As discussed further in Section IV.E, Geology, earthwork for the project would involve approximately 15,674 cubic yards of cut material and approximately 15,674 cubic yards of fill material, with nominal (i.e., less than 1,000 cubic yards) soil import and/or export, for a nearly balanced site in terms of earthwork. Additionally, under the proposed project, a number of buildings would be supported on drilled concrete piles that may penetrate into the underlying bedrock.

d. Analysis of Project Impacts

Although the areas of the project site proposed for new buildings have been previously disturbed through grading and/or development, there is still a potential to directly or indirectly destroy a unique paleontological resource or site or a unique geologic feature. As indicated above, the project site is located on fill material ranging in thickness of up to 43 feet. Natural alluvial soils underlie the fill and are encountered at depths ranging from 2 feet to 43 feet below the surface of the project site. From boring tests, it appears that the bedrock may be encountered in some areas within the project site at approximately 5 feet below the surface. In other areas of the site, bedrock occurs at a depth of 59 feet below grade. In any case, improvements or construction-related activities such as grading and the installation of foundation piles, if required, may encounter bedrock in some locations.

As stated previously, the records search indicates that deep excavations or any type of construction-related activities in the bedrock may result in a high probability of encountering remains of fossil marine vertebrates. Therefore, since excavation and construction in the bedrock may be required, implementation of the project does have the potential to result in significant adverse impacts associated with the permanent loss of, or loss of access to, a paleontological resource. However, with implementation of the proposed mitigation measures below, potential impacts would be reduced to less than significant levels.[106]

3. MITIGATION MEASURES

Both the CEQA Guidelines and the City of Los Angeles CEQA Thresholds Guide require that where potential impacts to paleontological resources cannot be avoided, mitigation measures shall be applied to ensure conservation of these resources. The following mitigation measures are required to reduce or avoid potential impacts on important paleontological resources:

Mitigation Measure D-1: A qualified paleontologist shall be retained by the applicant and approved by the lead agency to oversee and carryout the mitigation measures stipulated in this EIR. The services of the paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County.

Mitigation Measure D-2: Prior to the start of constructed-related activities, construction personnel involved with earth-moving activities shall be informed by the paleontologist of the potential for encountering significant paleontologic resources, instructed on the proper notification procedures when such an encounter occurs, and taught how to identify fossils and other potential resources. This shall include the provision of written materials to familiarize personnel with the range of resources that might be expected, the type of activities that may result in impacts, and the legal framework of paleontological resources protection. Construction personnel shall also be informed that unauthorized collection of fossil resources is prohibited.

Mitigation Measure D-3: Prior to the start of construction, the paleontologist shall conduct a field survey of exposures of sensitive stratigraphic units within the construction site(s) that will be disturbed by excavation and construction activities such as drilling and/or pile driving. Earth-moving construction activities at depths determined by the paleontologist to be sensitive will be periodically monitored where such activity may disturb or encounter bedrock material of the marine Late Miocene Modelo Formation (Monterey Formation). The frequency of monitoring efforts will be based on consultation with the paleontologist and will depend on the rate of excavation and grading activities; the type of construction-related activities, such as foundation pile driving/drilling; the materials being excavated; and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually

[106] *In the event that the proposed Aquatic Center is built on the adjacent portion of land owned by the SMMC, impacts would be similar since the bedrock underlying this area is identical to that underlying the project site.*

inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. Monitoring will not be conducted in areas where grading, excavation, and/or construction activities will not occur or in areas where exposed sediment will be buried, but not otherwise disturbed.

Mitigation Measure D-4: If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage.

Mitigation Measure D-5: At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing.

Mitigation Measure D-6: Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository.

Mitigation Measure D-7: Any fossils collected should be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.

Mitigation Measure D-8: Following the completion of the above tasks, the paleontologist shall prepare a report documenting the absence or discovery of fossil resources on-site. If fossils are found, the report shall summarize the results of the monitoring program, identify those fossils encountered, recovery and curation efforts, and the methodology used in these efforts, as well as describe the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and the required mitigation measures.

4. CUMULATIVE IMPACTS

As described in Section III, Environmental Setting of this EIR, 29 related projects have been identified within the greater project area. From a cumulative impact perspective, grading and excavation activities associated with the project in combination with other related projects in the project vicinity could contribute to the progressive loss of fossil remains, as-yet unrecorded fossil sites, associated geologic and geographic site data, and fossil-bearing strata. However, as described below, with implementation of the proposed mitigation measures, project impacts would be less than significant. It would also be expected that other related projects would implement such mitigation measures on a case-by-case basis if deemed appropriate as part of their environmental review. Thus, with implementation of the mitigation measures listed above, cumulative impacts associated with paleontological resources would be less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed paleontological resource mitigation measures would reduce, to a less than significant level, the direct, indirect, and cumulative adverse environmental impacts on paleontologic resources that could result from project-related construction activities. Therefore, with implementation of the mitigation measures above, no significant unavoidable adverse paleontological impact is anticipated as a result of the proposed project.

Additionally, it should be noted that with proper implementation of paleontological resource mitigation measures, project construction could result in beneficial effects on paleontological resources through the recovery of fossil remains that would not have been exposed without project construction and, therefore, would not have been available for study. The recovery of fossil remains as part of project construction could help answer important questions regarding the geographic distribution, stratigraphic position, and age of fossilferous sediments in the immediate area.

IV. ENVIRONMENTAL IMPACT ANALYSIS
E. GEOLOGY

1. ENVIRONMENTAL SETTING

The following analysis of geology and seismic hazards is based upon the technical report *Geologic and Geotechnical Engineering Report*, prepared by The J. Byer Group, Inc. This study is provided as Appendix F of this EIR.

a. Existing Conditions

(1) Geologic Conditions

The 18.3-acre project site is situated within a canyon setting on the north side of the Santa Monica Mountains, approximately two miles east of the San Diego Freeway (I-405) and one mile south of the Ventura Freeway (US-101). The topography of the site varies from approximately 750 feet above mean sea level (asl) within the northern part of the project site to more than 900 feet asl within the southern portion of the site. Natural, vegetated slopes border the central, developed areas of the site on both the east and west, rising at an average slope gradient of approximately 2:1.

Throughout the course of campus development, the project site has been filled with both compacted and uncompacted imported soils. Several generations of compacted fill are present on-site and date back to the original grading performed for the School in 1968. Notable areas of uncompacted fill include the surface parking lot in the northern portion of the site and the athletic field in the southern portion. Based on borings recently conducted, the compacted fill soils range from an upper layer of clayey sand that is brown, moist, medium dense and contains some gravel to deeper layers of dark gray, clayey sand that is moist and dense, with small pebbles of slate; other borings yielded fill of reddish brown to dark gray clayey sand that contains small slate gravel. The thickness of the fill ranges throughout the site from less than 20 feet to approximately 43 feet underneath the athletic field site.

Below the existing fill layers are natural alluvial soils consisting of an upper layer of brown, moist, firm, and porous silty clay; at depth, the alluvium is coarser, with silty sand, gravel, and small cobbles. Based on the borings, the alluvium depth varies throughout the site from approximately 28 feet to 59 feet below ground surface. The slopes on either side of the site contain natural soils consisting of dark brown, damp, dense, porous, clayey sand containing shale fragments. The underlying bedrock is part of the Miocene Modelo Formation and consists of siltstone with interbedded sandstone. The bedrock is exposed in natural outcrops located on the campus, as well as on cut slopes along Camino De La Cumbre to the west. The siltstone and sandstone is well-bedded, light gray to tan, and moderately hard. The bedrock and alluvial terrace are common to this area of the Santa Monica Mountains, and the geologic structure is consistent with regional trends. Based on mapping performed by The J. Byer Group, Inc., the bedding planes within the bedrock strike nearly east-west and dip consistently 25 to 30 degrees to the north.

The canyon drains to the north, and surface water flows from the graded/developed portion of the campus are collected in surface drains and catch basins and conveyed to the public storm drain system. Drainage flows from the south are also collected in an existing storm drain and directed north to the storm drain system. Secondary drainage from the east flows on-site as natural surface runoff. Groundwater was encountered in only a few borings conducted on-site by The J. Byer Group, Inc. at a depth of approximately 55 feet. This groundwater appears to be perched on top of bedrock and is seeping along the contact between bedrock and alluvium.

(2) Seismic Hazards

(a) Faulting and Ground Shaking

The project site is located in the seismically active region of southern California (California Building Code Seismic Zone IV) and, therefore, could be exposed to strong ground motion or ground shaking during a seismic event. Faults are classified as active, potentially active, or inactive. For the purposes of the Alquist-Priolo Earthquake Fault Zoning Map Act, the State of California defines active faults as faults that have historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch).[107] Active faults may be designated as Earthquake Fault Zones under the Alquist-Priolo Earthquake Fault Zoning Act, which includes standards regulating development adjacent to active faults. In addition, the City of Los Angeles designates Fault Rupture Study Zones on each side of potentially active and active faults to establish hazard potential.[108]

According to geologic investigations conducted for the project, no active faults have been identified on the site, and the site is not located within an Alquist-Priolo Earthquake Fault Zone. However, the primary seismic hazard affecting the project site is strong earthquake-induced

[107] *California Department of Conservation, California Geological Survey. Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) but do not displace Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present.*

[108] *City of Los Angeles General Plan Safety Element, Exhibit A, adopted by the City Council, November 26, 1996.*

ground shaking produced by faults in the surrounding area. The nearest known potentially active fault to the project site is the Santa Monica-Hollywood Fault, which is located approximately 4.2 miles south of the site. In addition, the Newport-Inglewood Fault and Malibu Coast Faults are located 8.6 miles and 8.9 south of the site, respectively. Figure IV.E-1 on page 219 shows the location of the project site with respect to various faults within the region, and the approximate distances of nearby faults and the associated Maximum Earthquake Magnitude are summarized in Table IV.E-1 on page 220.

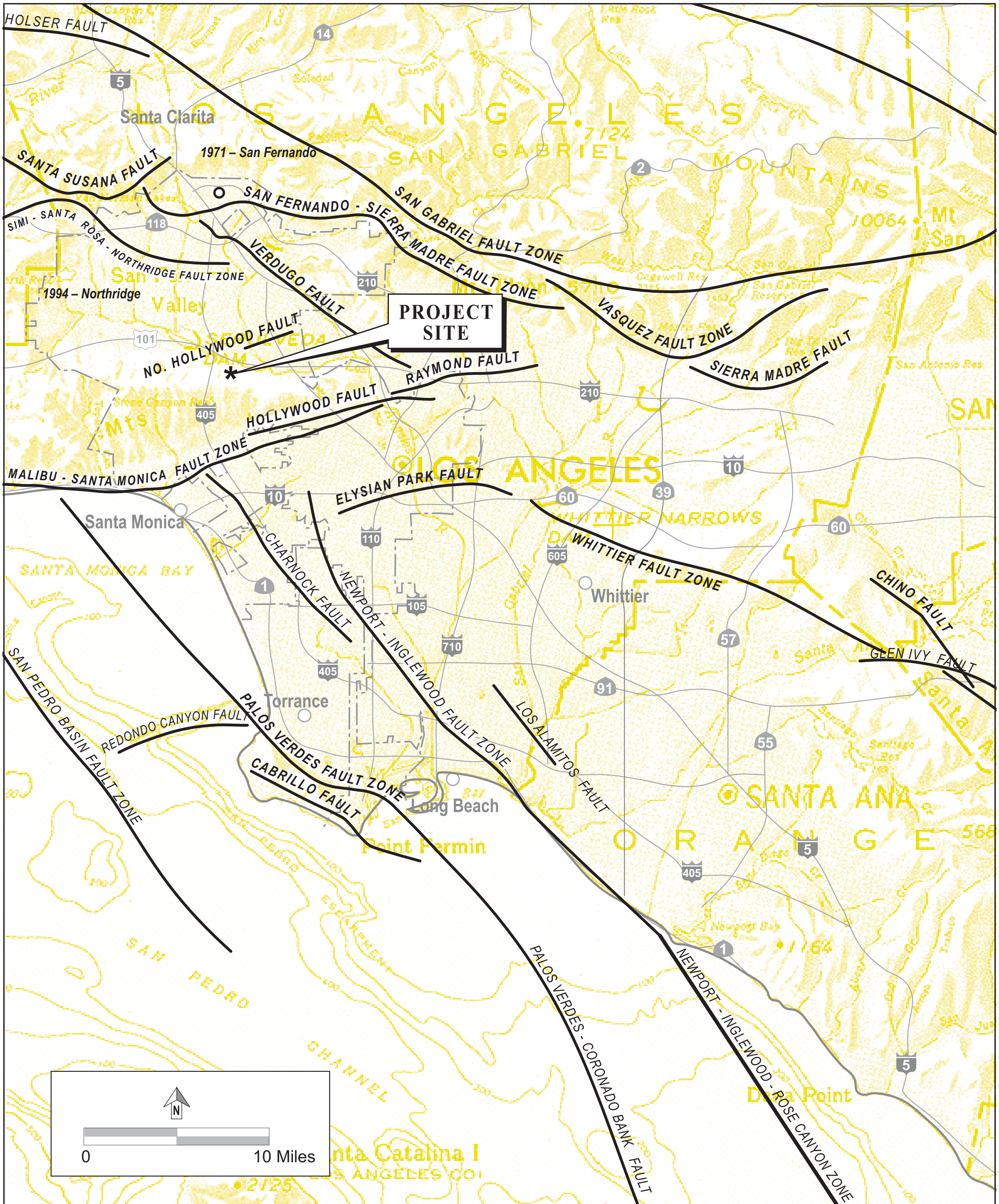
In January 1994, the Northridge earthquake occurred along a previously unknown blind thrust fault within the San Fernando Valley, approximately 6.5 miles northwest of the project site. The earthquake caused damage to a Lower School building located at the northwest corner of the Buckley School campus. When this area of campus was originally developed in 1968, compacted fill was placed over the existing grade without removal and recompaction of the upper alluvium, which is porous and subject to collapse upon saturation or earthquake-induced shaking. This is a localized condition, and the building was repaired by placing underpinning piles into the bedrock.

Ground rupture is defined as the surface displacement caused by an earthquake. As mentioned above, the site is located within the seismically active southern California region and would likely experience the effects of strong ground motion from earthquakes occurring on neighboring active faults. However, the potential for ground rupture at the project site due to faulting is considered remote.

(b) Liquefaction

Liquefaction is a phenomenon in which the structure of saturated soil collapses during strong ground shaking of considerable duration, causing water pressure in the soil to rise sufficiently to make the soil behave like a fluid for a short period of time. As a result, the soil temporarily loses considerable strength and capacity. Liquefaction generally occurs when three conditions exist: shallow groundwater; low density, fine, clean sandy soils; and high density ground motion. The effects of liquefaction on level ground include settlement and bearing capacity failures below structural foundations.

The materials beneath the project site consist of fill and natural alluvial soil over siltstone and sandstone bedrock. A high groundwater table is not present below the site, and the earth materials are fine grained. As such, the project site is not subject to liquefaction. The risk of liquefaction is also considered remote since the site is not located within a regional groundwater



PCR

Figure IV.E-1
Major Regional Faults

Source: U.S.G.S 1999 Data 1994 Fault Activity DMG Open-File Report by C. Jennings
and PCR Services Corporation, 2005

Table IV.E-1

Characterization of Faults in the Project Vicinity

Fault Name	Approximate Distance from the Site	Maximum Earthquake Magnitude [a]
Santa Monica-Hollywood Fault	4.2 miles (south)	6.4
Newport-Inglewood Fault	8.6 miles (south)	6.9
Malibu Coast Fault	8.9 miles (south)	6.7

[a] *The Maximum Earthquake Magnitude is the strongest earthquake that is reasonable to occur based on the current understanding of the fault's geologic framework.*

Source: The J. Byer Group, Incorporated; PCR Services Corporation, 2006.

basin. In addition, the project site is not located within an area designated by the State of California or by the City of Los Angeles for potential liquefaction.[109,110]

(c) Seismically Induced Landslides

Seismically induced landslides are typically associated with slope instability or earthquake-induced ground movement that occurs in proximity to steep canyons or hillsides. Although no evidence or record of landslides exists within the project site itself, portions of the ascending slopes on the site are mapped within a seismic landslide hazard zone referred to as a "Zone of Required Investigation," as shown on the most recent California Geologic Survey (CGS) Map of Seismic Hazard Zones (Van Nuys Quadrangle). In addition, portions of the project site lie within an area identified by the City of Los Angeles as having a cluster of small shallow surficial landslides.[111] Additional discussion of landslides is provided below.

(d) Seiche and Tsunami

A seiche is the oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, storage tank, or lake, in response to earthquake activity. There are no enclosed bodies of water within the project site that would be susceptible to seiches during an earthquake. The closest water body to the site is Upper Stone Canyon Reservoir, located approximately 1.5 miles southwest of the site, on the other side of the Santa Monica Mountains ridgeline. The

[109] *California Department of Conservation Division of Mines and Geology, Seismic Hazard Zones Van Nuys Quadrangle, dated February 1, 1998.*

[110] *Los Angeles, City of, Safety Element of the Los Angeles City General Plan, 1996.*

[111] *Figure GS-4, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report.*

potential for seiches at the site is low due to the absence of such bodies of water in the immediate vicinity.

A tsunami is a great sea wave, commonly called a tidal wave, produced by a significant undersea disturbance, such as tectonic displacement of the sea floor associated with large shallow earthquakes, landslides, volcanic eruptions, and nuclear explosions. Tsunami waves are capable of traveling great distances (over 1,000 miles) and damaging low-lying coastal regions. The project site's distance from the ocean and elevation precludes the potential for tsunamis.

(e) Seismically Induced Flooding

Seismically induced flooding occurs when water retention structures or facilities (such as dams or above-ground detention facilities) fail, allowing water to flow downstream unabated at higher-than-normal volumes. The project site is located approximately 1.5 miles from the Upper Stone Canyon Reservoir to the southwest. However, the project site is located on the other side of the Santa Monica Mountains ridgeline from the reservoir and is not located within the reservoir's path of inundation.[112] Therefore, the potential for seismically induced flooding to occur on-site is considered low. The project site is also protected from flooding by a large storm drain system on-site.

(3) Soil Stability

As discussed above, no evidence or record of landslides exists within the project site itself. However, portions of the site's slopes are mapped on the CGS Map of Seismic Hazard Zones (Van Nuys Quadrangle) as a "Zone of Required Investigation." In addition, portions of the project site lie within an area identified by the City of Los Angeles as having a cluster of small shallow surficial landslides. Heavy rains in early 2005 caused mudslides above Camino de la Cumbre (immediately west of and upslope from the campus), and there is evidence that mud and debris crossed the roadway to the chain link fence along the School's property boundary. These slides were a result of erosion caused by surface water runoff from the undeveloped hillside above Camino de la Cumbre, which sheet flows down the slope in an uncontrolled (i.e., unimproved) manner. In order to divert excess drainage and mud around the curve of the road, Buckley constructed a small berm and block wall along the edge of the road. Please refer to Section IV.G, Hydrology, of this EIR for further discussion of hydrological conditions associated with the site and surrounding area.

[112] *Figure GS-7, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report.*

Nonetheless, the analysis undertaken as part of the Geologic and Geotechnical Engineering Report provided in Appendix F indicates that site conditions are grossly stable from a geologic standpoint. Specifically, the natural residual soil was determined to be surficially stable. The natural slopes on-site do not exhibit signs of surficial slope failure or erosion. Based on a slope stability analysis performed for the project site, a factor of safety against large slope failures within the site is in excess of 1.5.[113, 114] Furthermore, the on-site soils are not subject to lateral spreading.

Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, often resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. Subsidence should not affect those areas of the site where development has or will occur on compacted fill. However, open space and uncompacted fill areas of the site, such as the athletic fields, may be subject to movement.

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. The expansion potential of the fill on the project site was tested and determined to range from an expansion index of 18 to 42, which is in the very low to low range. Therefore, the risk of soil expansion is considered low.

(4) Mineral Resources

The project site, which is underlain by Miocene sandstone and shale, does not contain any mineral resources. In addition, the project site is not designated as a Mineral Resource Zone (MRZ) by the State of California and is not noted in the Conservation Element of the City of Los Angeles General Plan as being of local importance for mineral resources. However, the bedrock formation underlying the site is known to contain marine vertebrate fossils. Please see Section IV.D, Cultural Resources, for further discussion of paleontological resources.

[113] *A slope factor of safety of 1.0 indicates that the forces resisting slippage (strength) are exactly equal to the downward force of gravity (stress). The Building Code requires that the factor of safety for site slopes be at least 1.5, or in other words that the inherent resistance of the slope be 50 percent greater that its potential to slide.*

[114] *Despite this factor of safety, The J. Byer Group determined that for surficial deposits overlying natural slopes site-specific geotechnical recommendations (provided in Appendix G) should nonetheless be implemented to ensure sufficient soil stability.*

b. Regulatory Framework

(1) California Geological Survey

The California Geological Survey provides guidance with regard to seismic hazards. Under the CGS's Seismic Hazards Mapping Act, seismic hazard zones are identified and mapped to assist local governments in planning and developing. The intent of this publication is to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and other hazards caused by earthquakes. In addition, the CGS's *Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California* provides guidance for evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation.

(2) City of Los Angeles

Specific grading requirements and regulations for hillside areas are governed by the Los Angeles Municipal Code (LAMC), Chapter IX, Article 1, Division 70. Specifically, Section 91.7005 provides grading provisions for hillside areas, including regulations pertaining to building foundations, removal of ground cover, and hazardous soil and earth conditions. Additionally, Section 91.7006, "Conditions Precedent to Issuing a Grading Permit," details submittal information required for hillside grading. Section 91.7006.7 includes requirements regarding import and export of material, Section 91.7010 includes regulations pertaining to excavations, and Section 91.7011 includes requirements for fills. Section 91.7012, "Planting and Irrigation of Cut and Fill Slopes in Hillside areas," provides ground cover requirements for erosion control, and Section 91.7013 includes regulations pertaining to erosion control and drainage devices. Section 91.7014, "Construction Requirements and Limitations," includes general construction requirements as well as requirements regarding flood and mudflow protection, and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils.

2. ENVIRONMENTAL IMPACTS

a. Methodology

An assessment of grading, site design, and seismicity was performed to identify potential impacts associated with geology and soils. As indicated above, the analysis is based on a Geologic and Geotechnical Engineering Report, which was prepared by J. Byer Group, Inc. and is included as Appendix F of this EIR. The geotechnical exploration was prepared based on review of existing documentation, field investigations (subsurface exploration), and laboratory testing. Please refer to Appendix F for additional discussion of the specific methodologies utilized for the various analyses and calculations performed as part of the exploration.

b. Threshold of Significance

(1) Geologic Hazards

The following threshold of significance will be applied to the proposed project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant geologic hazard impact if:

- The project would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

(2) Landform Alteration

The following threshold of significance will be applied to the proposed project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on landform alteration if:

- One or more distinct and prominent geologic or topographic features would be destroyed, permanently covered, or materially and adversely modified as a result of the project. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands.

(3) Sedimentation and Erosion

The following threshold of significance will be applied to the proposed project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant sedimentation or erosion impact if it would:

- Constitute a geologic hazard to other properties by accelerating instability from erosion; or
- Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

(4) Mineral Resources

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis:

- The project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 or other known or potential mineral resource area; and
- The mineral resource is of regional or statewide significance or is noted in the Conservation Element as being of local importance.

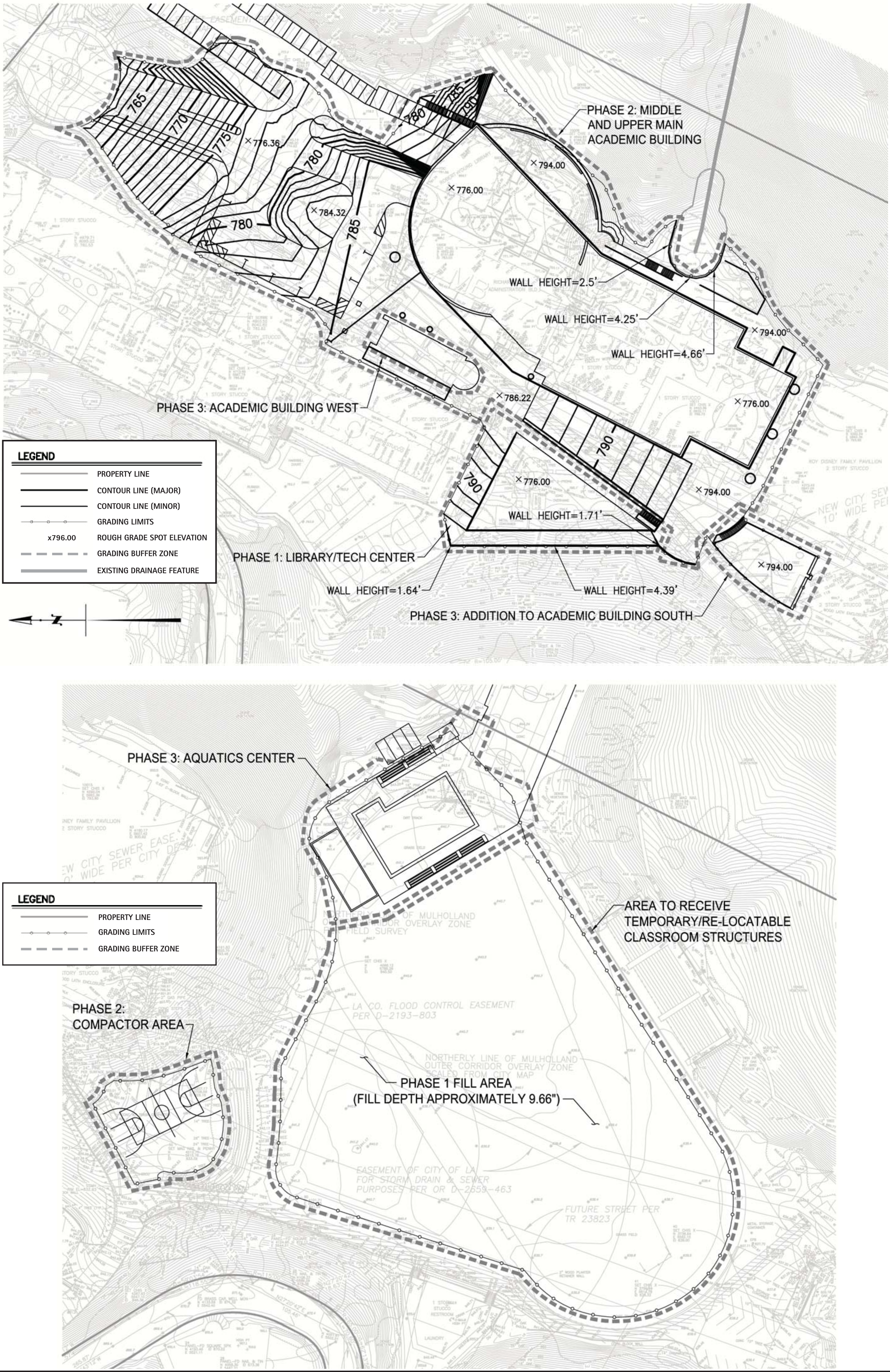
These factors will be applied to the proposed project as thresholds of significance.

c. Project Features

The project proposes to demolish approximately 26,350 square feet of existing building area at the Buckley School campus and construct approximately 69,500 net new square feet. The proposed improvements would involve the demolition of six buildings, the construction of five new/replacement buildings, a central plant, a new enclosed parking facility, addition to one existing building, and renovation of several existing buildings. As shown in Figure II-4 on page 59 in Section II, Project Description, the new structures would be located within the previously developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon and the natural vegetation. Nevertheless, implementation of the proposed improvements would modify the existing topography in some areas of the campus. Although grading would primarily occur in developed or paved areas, some grading activities would take place adjacent to the slopes that line the canyon.

As illustrated in Figure IV.E-2 on page 226, grading for the project would involve an estimated 15,674 cubic yards of cut and 15,674 cubic yards of fill, with nominal (i.e., less than 1000 cubic yards) soil import and/or export.[115] It is anticipated that nearly all grading materials would be used on-site to backfill around the enclosed Parking Facility, raise the finished grade in the northern and central areas of the campus (e.g., within the arrival plaza, around the Middle and Upper School Main Academic Center, and along the pedestrian walkway/fire access route traversing the campus), and to raise the level of the athletic field by approximately 10 inches. All grading activities would comply with applicable City of Los Angeles grading requirements. Remedial grading and recompaction of previously used uncompacted fill soils would also be

[115] *Quantities are approximate in place volumes calculated from the existing ground to the proposed finish grade.*



0 30 60 120 Feet

Source: KPFF Consulting Engineers, 3/2006.

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Figure IV.E-2
Grading Plan

performed in some areas of the site in order to improve site conditions. The project would also adhere to site-specific geotechnical recommendations (refer to Appendix F) regarding grading specifications and fill placement. Activities associated with soil import/export would occur in accordance with City requirements, as specified in the LAMC and through the grading plan review and approval process.

One notable area proposed for cut and fill operations, along the existing access road through campus that would become a central pedestrian walkway/fire access route as part of the project, currently contains uncertified fill and alluvium over bedrock. Due to the depth of the existing fill and the presence of a public storm drain, it is not feasible to remove and re-compact the existing fill prior to raising the grade in this area. As such, a Building Code modification would be necessary in order to place new fill over the uncertified fill. Any permanent structures located over areas of uncertified fill would be founded on piles and derive support entirely from underlying bedrock, and as such, no permanent structures would be supported by uncertified fill.

A deepened foundation system consisting of friction piles and grade beams would be utilized to support a number of the proposed structures, including the proposed swimming pool. Additional information regarding site preparation, foundation design, retaining walls, floor slabs, paving, drainage, waterproofing, and construction site maintenance is provided in the Geologic and Geotechnical Engineering Report in Appendix F.

The project would be constructed in accordance with State and City regulations and ordinances governing earthwork activities and seismicity. The proposed project would also comply with CBC and Uniform Building Code (UBC) requirements, which are adopted in the LAMC, to minimize seismic hazards. Additionally, the project would comply with the CGS *Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California*.

d. Analysis of Project Impacts

(1) Seismic and Geologic Hazards(a) Groundshaking

As previously discussed, the nearest potentially active fault to the project site is the Santa Monica-Hollywood Fault located approximately 4.2 miles south of the site. As stated in the 1997 UBC, the faults located nearest to the project site are classified as Type "B" faults.[116]

[116] *Type A faults are active and capable of producing large magnitude events. Most segments of the San Andreas and associated faults are classified as Type A. The Type A slip rate (>5 mm/yr) and magnitude (Mw 7.0 or greater) are common only to faults near boundaries of tectonic plates (Pacific and North American). Type C*

(Footnote continued on next page)

The principal seismic hazard at the project site is strong groundshaking from earthquakes produced by local faults. Modern buildings are typically designed to minimize or eliminate safety risks associated with groundshaking, such as through the use of shear panels and reinforcement. Nonetheless, similar to other developments throughout southern California, implementation of the project would result in exposure of people on-site to a degree of seismic hazard risk associated with groundshaking. Construction in accordance with UBC and LAMC requirements would minimize such risks. In addition, the project would be constructed in accordance with the specific recommendations provided in the Geologic and Geotechnical Engineering Report, which is included as Appendix F. Following project implementation, the new structures would have a greater degree of seismic safety as compared to existing, older buildings within the campus. Therefore, the project would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Thus, potential impacts associated with groundshaking would be reduced to the extent possible and would be less than significant.

(b) Liquefaction

The project site is not included within an area identified by the CGS or the City of Los Angeles as potentially containing liquefiable material.[117] Due to the lack of a high groundwater table and the presence of fine-grained materials, the project site is not subject to liquefaction. Therefore, no significant impacts associated with liquefaction would occur.

(c) Seismically Induced Landslides

Portions of the project site are mapped within an area identified as a “Zone for Required Investigation” for earthquake-induced landslides, per the Seismic Hazard Map Act, and within an area identified as containing a cluster of small shallow surficial landslides, per the City of Los Angeles. As previously discussed, site conditions are grossly stable from a geologic standpoint, and the natural slopes on-site do not exhibit signs of surficial slope failure. Furthermore, the project would implement site-specific geotechnical recommendations (provided in Appendix F) to ensure adequate slope stability. Therefore, the project would not cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Potential impacts associated with seismically induced landsliding would be less than significant. Discussion of soil stability and erosion-related mudslides is provided below.

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seismic sources are considered to be sufficiently inactive and not capable of producing large magnitude events such that potential ground shaking effects can be ignored. Type B sources include all faults that are neither Type A nor C, thus Type B includes most of the active faults in California.

[117] *Seismic Hazard Map of the Van Nuys 7.5’ Quadrangle, Los Angeles County, California Official Map, February 1, 1998.*

(d) Seiche and Tsunami

As previously mentioned, the project site is not located in the immediate vicinity of any large bodies of water. Accordingly, the potential for seiches or tsunamis at the site is low. Therefore, the proposed project would not be subject to the effects of seiches and tsunamis, and no significant impacts would occur.

(e) Seismically Induced Flooding

As discussed above, the project site is located within approximately 1.5 miles of the Upper Stone Canyon Reservoir to the southwest. However, the project site is not located within its path of inundation. As such, the potential for seismically induced flooding to occur at the site is considered low. Therefore, the proposed project would not be subject to seismically induced flooding, and no significant impacts would occur.

(f) Soil Stability

As previously discussed, the potential for subsidence to affect new development on-site is low and should not affect those areas of the site where development has or will occur on compacted fill. However, open space and uncompacted fill areas of the site, such as the athletic fields, may be subject to movement. Temporary classrooms would be placed on the athletic field during the construction of Phase 2. However, any settlement that could potentially occur at the athletic field would be minimal and would not present a safety concern for the temporary classrooms.[118] Following the temporary use, the classrooms would be removed and the field would be restored. Therefore, no significant impacts associated with subsidence would occur. Additionally, the expansion potential of the fill on the project site was determined to be in the very low to low range. Therefore, no significant impacts associated with expansive soils would occur.

As also discussed above, heavy rainfall in early 2005 caused mudslides above Camino de la Cumbre (immediately west of and upslope from the campus). Mud and debris from these mudslides crossed the roadway and came to rest on the chain link fence along the School's property boundary. To prevent future occurrences such as these, the Geologic and Geotechnical Engineering Report recommends erosion control for those areas where concentrated off-site flows can carry mud and water onto the project site. As the School has no control with regard to maintaining adequate off-site drainage, off-site mudslides above Camino de la Cumbre could potentially reoccur. However, with the School's previous construction of the small berm and block wall, mudslide impacts to the project site itself would be less than significant.

[118] *Personal communication, James E. Tucker, Project Geologist, The J. Byer Group Inc., June 2, 2006.*

The Geologic and Geotechnical Engineering Report concluded that construction of the proposed project is feasible from a geologic and soils engineering standpoint, provided that the advice and recommendations in the report are incorporated in the project plans and are implemented during construction. With implementation of the recommendations provided in the geotechnical report, as well as adherence to all applicable regulatory requirements, including the City's permitting and construction inspection procedures, project impacts relative to soil stability would be less than significant.

(2) Landform Alteration

The project has been specifically designed so that grading would occur primarily on previously developed or graded areas. Thus, the project would not significantly modify the existing topography or the adjacent hillsides. The only notable area of undeveloped land that would be developed is the northern portion of the athletic field where the Aquatic Center would be constructed, which is already generally level. No ridgelines would be affected by project implementation. Additionally, none of the streambeds on or adjacent to the site would be destroyed, covered, or materially modified. (Refer to Section IV.C, Biological Resources, for further discussion of other impacts to local streambeds.) The natural ravine located south of the athletic field would also be unaffected. With the incorporation of the project design features and additional site-specific geotechnical recommendations, the proposed project would not destroy, permanently cover, or materially or adversely modify a prominent geologic or topographic feature. Therefore, project implementation is not anticipated to result in significant impacts associated with landform alteration.

(3) Sedimentation and Erosion

Since the project would require cut and fill, soil erosion could potentially occur on-site. Specifically, grading, excavation, and other earth-moving activities could expose site soils to wind- or water-generated erosion. However, as described in Section IV.G, Hydrology, of this EIR, best management practices (BMPs), which would reduce and/or eliminate erosion potential, would be utilized as part of project development. Natural surface water flows, such as that entering the site from the east, can also be a source of eroded soil materials. Consequently, erosion control devices would be introduced on-site as appropriate and maintained as required. Implementation of BMPs and other erosion control measures would ensure that erosion-related hazards would be minimized on the site. Thus, the project would not create a geologic hazard to other properties by accelerating instability from erosion, nor would it accelerate natural processes of wind and water erosion or sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. As such, impacts associated with hazards from erosion would be less than significant. Other associated or indirect impacts that could result from site grading, such as dust generation, are addressed in Section IV.B, Air Quality, of this document.

(4) Mineral Resources

According to the CGS, no mineral resources or important aggregate resources are located within the project site boundaries or in the project area. As such, no impacts to mineral resources would occur as a result of the project.

3. MITIGATION MEASURES

The following mitigation measure is proposed to ensure that potential geotechnical impacts would be less than significant:

Mitigation Measure E-1: The Applicant or its contractor shall incorporate the recommendations detailed in the geotechnical investigation prepared for the proposed project, as approved by the City of Los Angeles. (Geotechnical recommendations regarding general findings, the proposed swimming pool, foundation design, retaining walls, floor slabs, paving, drainage, waterproofing, plan review, site observations during construction, and construction site maintenance are provided on pages 13 through 22 of the Geologic and Geotechnical Engineering Report, prepared by The J. Byer Group, Inc. provided in Appendix F of this EIR.)

4. CUMULATIVE IMPACTS

Impacts associated with geologic issues are generally associated with a specific project site or a particular localized area. None of the related projects are located within the immediate vicinity of the project site. Thus, cumulative geologic impacts resulting from the project and other related projects would not occur. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. However, all projects are required to comply with state and local regulations regarding seismic hazards. Adherence to these applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of the proposed mitigation measure, significant impacts associated with geology and seismic hazards would not occur as a result of the proposed project.

IV. ENVIRONMENTAL IMPACT ANALYSIS
F. HAZARDS AND HAZARDOUS MATERIALS

The following analysis of hazards and hazardous materials is based on the March 2005 Phase I and Phase II Environmental Site Assessment and the January 2006 Site Assessment Report prepared by Rincon Consultants, Inc. Both reports are provided in Appendix H of this EIR. Additionally, this section incorporates the findings of the Lead-Based Paint Inspection Report and Asbestos Abatement Report provided in Appendix G of this EIR.

1. ENVIRONMENTAL SETTING

a. Historic Use of the Project Site

Based on review of historical aerial photographs, in 1928 the project site included graded areas and structures or foundations surrounded by undeveloped areas. By 1940, the project site was developed as a country club and golf course and by 1952 the site appeared to be graded with several smaller structures or trailers. As discussed in Section II, Project Description, The Buckley School was moved to the project site following the approval of a Conditional Use Permit (CUP) in 1965 by the City Planning Commission. Campus buildings were subsequently constructed through the early 1970s. The site has been used for educational purposes since the late 1960s.

As discussed in the Phase I Environmental Site Assessment (Phase I), a bus maintenance garage was previously located within the project site near the existing Transportation Building. According to information obtained during the Phase I, it appears that a hydraulic lift, and a clarifier were previously associated with the former bus maintenance garage. The hydraulic lift was removed and the clarifier was abandoned in place. As discussed in more detail below, an anomaly believed to be a UST in the vicinity of the former bus maintenance garage may potentially be located at the project site. In addition, as discussed in more detail below, the UST formerly located in the surface parking area southwest of the existing science building was removed in 1988 with regulatory oversight.

b. Existing Use of Hazardous Substances

Typical of educational facilities, nominal quantities of hazardous substances are currently used at the project site. These substances are associated with the operation and maintenance of buildings, surrounding landscape, the basketball court, baseball field, the swimming pool, and with the operation of the science and art classrooms and the print shop. Use and storage of these materials are summarized below and described in greater detail in the Phase I.

- **Storage Sheds:** Several storage sheds located south of the baseball field are used for storing electrical, mechanical, and janitorial supplies, paints, groundskeeping equipment, and fertilizer. Small quantities of hazardous substances including gasoline, diesel fuel, paint, spray paint, adhesives, coatings, stains, seals, and compressed gases are also stored in this area. Additionally, waste oil and waste paint are occasionally stored in drums on secondary containment pallets outside of one of the sheds.

- **Swimming Pool:** Chlorine and other pool chemicals are stored in the swimming pool maintenance area.

- **Classrooms:** Small quantities of various laboratory chemicals, glazes, and stains are stored in the science and art classrooms and small quantities of printing chemicals are stored in the print shop.

No areas of significant staining or obvious spills were observed during the Phase I in the areas noted above that would represent an environmental concern to the project site.

As part of the Phase I, Federal, State, and local environmental regulatory agency lists were reviewed for the project site. The project site appears on the Resource Conservation and Recovery Information System-Small Quantity Generator (RCRIS-SQG), Facility Index System (FINDS), Hazardous Waste Information System (HAZNET), California Facilities Inventory Database (CA FID UST), Leaking Underground Storage Tank (LUST), Hazardous Waste and Substance Sites (Cortese), and Emergency Response Notification System (ERNS) lists. The RCRIS-SQG, FINDS, and HAZNET listings pertain to small quantities of waste that are generated at the project site (i.e., science laboratory chemical waste, etc). The CA FID UST listing pertains to a permitted UST. These listings in and of themselves do not present a concern. The LUST, Cortese, and ERNS listings pertain to a release from the UST that was removed in 1988. This release is discussed in greater detail below.

c. Electrical Transformers and Hydraulic Equipment

Based on the Phase I Environmental Site Assessment, there are 13 electrical transformers and hydraulic equipment for one elevator and one dumbwaiter located on-site. Based on the Phase I, there were no indications of a release in the vicinity of the transformers. While a small oil leak was observed within a contained area beneath the hydraulic equipment for the elevator, the concrete flooring, which serves as a barrier between the equipment and underlying soils, was in good condition. This small oil leak was subsequently repaired. Thus, the potential to impact the underlying soil was considered low and this condition was considered de minimus. No indications of recent spills or leaks were observed beneath the dumbwaiter equipment.

d. Asbestos and Lead

The Buckley School was constructed in the late 1960s to early 1970s (prior to regulation of certain hazardous materials in 1979). As such, the presence of asbestos containing materials (ACM) has been confirmed in some of the buildings located on-site. An Operations and Maintenance Program for Asbestos Containing Materials was prepared for the project site and was last updated in December 2005. This program includes initial cleaning requirements that have been implemented, routine inspection procedures, and removal procedures, all of which ensure that staff and students do not come into contact with ACM. As part of the program, inspections have occurred regularly with sampling activities as recent as 2006. Refer to Appendix G for the most recent re-inspection report. In addition, as discussed in the Asbestos Abatement Report provided in Appendix G, removal of ACM and cleaning occurred as recently as 2005.[119]

In July 2001, extensive air monitoring of all campus rooms and hallways was completed concluding no presence of asbestos airborne fibers. In addition, as part of subsequent asbestos abatement work and clean up activities, additional air monitoring was performed which also concluded no presence of asbestos. Thus, it was determined that the campus is safe and free from any air-borne asbestos fire hazards.[120]

Due to the age of the buildings located at the project site, surveys have been conducted to determine the presence of lead-based paints. The surveys have confirmed that lead-based paints are present in two doorframes of the restrooms of the Upper School.[121] Additionally, lead was also found to be present within the ceramic tiles of some building rooms. Both the doorframes and the tiles are maintained regularly to ensure that exposure from lead does not occur.

e. Assessment of Underground Storage Tanks and Former Bus Maintenance Garage

As noted above, the Phase I Environmental Site Assessment indicates that a bus maintenance garage was previously located within the project site near the existing Transportation Building. A hydraulic lift and clarifier were previously associated with the

[119] *Medici, Kenneth, Asbestos Abatement Report, January 7, 2006.*

[120] *Medici, Kenneth, Asbestos Re-inspection Report, December 27, 2005.*

[121] *Medici, Kenneth, Lead-Based Paint Inspection Report, Report ID #LBP-01, April 2006.*

former bus maintenance garage. The hydraulic lift was removed and the clarifier was abandoned in place. The Phase I noted the potential presence of a UST in the vicinity of the former bus maintenance garage. The Phase I concluded that additional assessment of the hydraulic lift, clarifier, as well as the possible presence of a UST was warranted. These areas were further addressed in the Phase II, which included a geophysical survey, soil sampling, and groundwater sampling. In addition, review of agency records indicate that a 10,000-gallon steel gasoline UST was removed from the surface parking area southwest of the existing science building in 1988 with regulatory agency oversight.

As discussed in the Phase II Environmental Site Assessment, in December 2004, a geophysical survey confirmed the presence of a small (approximately 10 feet by 4 feet) anomaly believed to be a UST in the vicinity of the former bus maintenance garage. Based on the size and location of the anomaly, it is assumed to have been a waste oil tank.

Soil sampling was conducted in the vicinity of the former bus maintenance garage (specifically near the former hydraulic lift, former clarifier, and anomaly believed to be a waste oil UST) as well as in the vicinity of the former UST removed in 1988 from the surface parking area southwest of the existing science building. The soil samples collected in the vicinity of the former bus maintenance garage were analyzed for total petroleum hydrocarbons as diesel range organics (TPH-DRO) and oil range organics (TPH-ORO); benzene, toluene, ethylbenzene, xylenes (BTEX) and other volatile organic compounds (VOCs) (including acetone and tetrachloroethylene [PCE]); polychlorinated biphenals (PCBs); and metals. The soil samples collected in the vicinity of the former UST were analyzed for TPH-g; TPH-DRO; TPH-ORO; BTEX; oxygenates (including methyl tert-butyl ether [MTBE] and tert-butyl alcohol [TBA]); and lead. To evaluate the significance of the reported contaminant levels in the soil samples, concentrations were compared to the appropriate regulatory thresholds including RWQCB soil screening thresholds, U.S. Environmental Protection Agency Preliminary Remediation Goals (USEPA PRGs), and Department of Toxic Substance Control (DTSC) hazardous waste thresholds. A summary of the results of this soil sampling analysis is provided below and described in more detail in the Phase II provided in Appendix H.

- Concentrations of TPH-DRO, TPH-ORO, and PCBs were not detected.

- Metals concentrations detected in the soil samples did not exceed the total threshold limit concentration (TTLC) or soluble threshold limit concentration (STLC) levels used to determine whether the soil would be classified as a hazardous waste for disposal purposes. The metals were also well below the USEPA PRGs, with the exception of arsenic, which was detected at a maximum concentration of 14.1 mg/kg. Although this exceeds the USEPA PRGs for residential uses for arsenic (0.062

mg/kg), this concentration is within the published ranges for normal background concentrations of arsenic in soils in the western United States.[122]

- TPH-g and benzene were detected at concentrations exceeding the RWQCB soil screening level (SSL) in one sample within the area of the former UST at 25 feet below grade (1,080 mg/kg and 8.4 mg/kg, respectively). The benzene detected in this sample exceeded the residential PRGs. The vertical extent of this contamination could not be determined at the time of the Phase II due to drilling refusal. This area was further studied in a Site Assessment Report as discussed below.

- BTEX and MTBE were detected at concentrations that might exceed the SSL in soil samples near the former UST area. BTEX and MTBE were further evaluated in a Site Assessment Report as discussed below.

- Tert-butyl alcohol (TBA) was detected in several soil samples in the former UST area. There is no MCL for TBA, therefore no SSL can be calculated.

- Low concentrations of the VOCs PCE (0.027 mg/kg) and acetone (0.12 mg/kg) were detected 5 feet below grade near the anomaly that is believed to be a waste oil tank. The PCE and acetone detected are below the residential PRGs. The SSL for PCE ranges from 0.005 to 1.275 mg/kg for various soil types and distances above groundwater. Based on the shallow depth of the PCE, it is unlikely that the PCE SSL would be exceeded.

As part of the Phase II, a groundwater sample from the pool sump pump was collected and analyzed for TPH-g, TPH-DRO, TPH-ORO, BTEX, and VOCs. Concentrations of all these contaminants were below detectable levels.

In November 2005, a Site Assessment Workplan was prepared and submitted to the LAFD to further assess soil and groundwater in the vicinity of the former UST. The LAFD approved the workplan in December 2005. The workplan together with the findings of implementation of the workplan are presented in the Site Assessment Report prepared by Rincon Consultants in January 2006. As discussed in the Site Assessment Report, one soil boring near the center of the former UST was advanced to groundwater (approximately 41 to 55 feet below grade) and converted to a groundwater monitoring well. During drilling, soil samples were collected at various intervals. The soil and groundwater samples were analyzed for TPH-g, BTEX, and oxygenates (including MTBE). A summary of the results of this soil and

[122] *The Phase I and Phase II Environmental Sties Site Assessment prepared by Rincon Consultants in March 2005 states that .the range of arsenic observed in background soil in the western United States is between 0.10 and 97.0 mg/kg.*

groundwater sampling analysis is provided below. The results are described in more detail in the Site Assessment Report provided in Appendix H.

- TPH-g and BTEX were detected well below the applicable SSL and PRGs.
- MTBE was detected in soil samples 20 and 30 feet below grade at concentrations of 0.386 mg/kg and 0.005 mg/kg, respectively. The detected concentrations of MTBE are below the residential PRGs. Based on site-specific information, the appropriate SSL for MTBE at 20 feet above groundwater was calculated to be 0.0442 mg/kg. Therefore, the MTBE concentration at 20 feet below grade exceeds the SSL.
- Toluene was detected in the groundwater sample at a concentration of 1.2 microns per liter (μg/L). The MCL established by the RWQCB for toluene in drinking water is 150 μg/L. Therefore, the toluene concentration is well below the MCL.

Overall, the results of the additional soil and groundwater monitoring presented in the Site Assessment Report indicate that all detected contaminants are below the respective screening levels for the detected constituents with the exception of MTBE at 20 feet below grade. In addition, the groundwater sample did not have any detected constituents that exceed its maximum contaminant level in drinking water. Based on the low levels and the impermeable soil lithology between the contamination and the groundwater, the Site Assessment Report recommends that no further action be required in regards to the former UST and that RWCQB maintain case closure.

2. REGULATORY FRAMEWORK

a. Hazardous Substances

The use and storage of hazardous materials within the project site are subject to Federal, State, and local regulations. At the local level, the LAFD monitors the storage of hazardous materials for compliance with the local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. In addition, employees and employees of contractors that handle hazardous wastes or are potentially exposed to hazardous wastes, are required under Federal Occupational Safety and Health Administration (OSHA) (29 C.F.R. § 1910.120) and Cal-OSHA regulations to be trained and certified to handle hazardous waste and materials.

b. Asbestos and Lead

In California, any facility that is known to contain asbestos is required to have a written asbestos management plan. Removal of asbestos containing materials must be conducted in accordance with the requirements of the South Coast Air Quality Management District (SCAQMD) Rule 1403. Rule 1403 regulations require: (1) a survey of the facility prior to issuance of a permit by the SCAQMD; (2) notification of the SCAQMD prior to construction activity; (3) asbestos removal in accordance with prescribed procedures; (4) placement of collected asbestos in leak-tight containers or wrapping; and (5) proper disposal.

Cal-OSHA has established limits of exposure to lead contained in dusts and fumes. Specifically, California Code of Regulations (CCR) Title 8, Section 1532.1 provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead.

c. Underground Storage Tanks

The storage of hazardous materials in USTs is regulated by the State Water Resources Control Board (SWRCB), which has delegated authority to the RWQCB and typically on the local level, to the fire department. The LAFD administers and enforces Federal and State laws and local ordinances for USTs at the project site. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

3. ENVIRONMENTAL IMPACTS

a. Methodology

- To evaluate potential impacts associated with hazardous materials at the project site, Phase I and Phase II Environmental Site Assessments were conducted at the project site and a Site Assessment Report was also prepared. A Phase I is intended to be a general characterization of selected environmental concerns. The characterization is based on readily ascertainable information and project site observations.

- Pursuant to the findings of the Phase I, a Phase II was conducted. A Phase II is intended to evaluate potential impacts (i.e., soil or groundwater contamination) associated with environmental concerns identified in the Phase I.

- Pursuant to the findings of the Phase II, a Site Assessment Report was conducted. A Site Assessment Report is intended to further assess the soil and/or groundwater contamination identified in the Phase II.

Based on the Phase I and Phase II Environmental Site Assessment and the Site Assessment Report, the potential for construction and operation of the project to result in significant impacts associated with hazardous materials was evaluated.

Impacts associated with emergency access were evaluated based on review of the Traffic Study prepared for the project and presented in Appendix L.

b. Threshold of Significance

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis in making a determination of significance:

(1) Risk of Upset/Emergency Preparedness

- Compliance with the regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- Compliance with the regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Based on these factors, the project will be considered to have a significant risk of upset/emergency preparedness or human health hazards impact if:

- It does not comply with applicable regulations regarding the handling and storage of hazardous materials or if it would consistently increase interference with existing emergency response capacity to the project area over existing conditions.

c. Analysis of Project Impacts

(1) Hazardous Substances

Construction of the proposed project may involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, cleaning agents, and pesticides for landscaping purposes. These and all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturer's instructions. Therefore, impacts from the use of these hazardous substances during construction would be less than significant.

As discussed above, nominal quantities of hazardous substances are currently used at the project site. These substances are associated with the operation and maintenance of buildings, surrounding landscape, basketball court, baseball field and the swimming pool, and operation of the science and art classes and print shop. Thus, operation of the proposed project would involve the continued use of small quantities of hazardous substances in the form of cleaning solvents, pesticides and fertilizer for landscaping, gasoline, diesel fuel, paint, spray paint, adhesives, coatings, stains, seals, chlorine and other pool chemicals, various laboratory chemicals, glazes and small quantities of printing chemicals. The Phase I determined that the use of such hazardous substances is not an environmental concern. The use, storage, and disposal of all potentially hazardous materials would continue to be conducted in small quantities and in accordance with applicable laws and regulations and manufacturer's instructions for such products. Therefore, impacts associated with the use of these hazardous substances during operation would be less than significant.

(2) Asbestos and Lead

ACM has been identified in the buildings located at the project site. As such, the demolition of or modifications to any of these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition activities. Due to the potential release of asbestos fibers into the atmosphere, the proposed project could potentially result in significant impacts related to hazards and hazardous materials in this area. However, compliance with the regulatory framework (SCAQMD Rule 1403) would reduce potential impacts to construction workers and the general public in the vicinity of the project site. Furthermore, these materials would be entirely contained with plastic or other required methods of containment and disposed of in compliance with applicable regulations. Compliance with such regulatory requirements as set forth in the mitigation measure below would reduce potential impacts to a less than significant level.

Lead-based paints are known to be present on the doorframes of restrooms at the Upper school. As indicated above, these materials are maintained regularly to ensure that potential exposure from lead does not occur. Since the project would involve the demolition of the Upper School, the potential for lead exposure exists. However, the project would comply with OSHA Regulations (Title 8 CCR Section 1532.1 and 29 CFR 1926.62) for construction work involving potential lead exposure. Additionally, a mitigation measure is proposed to ensure that lead-based paint removal would be conducted by a certified lead containment contractor in compliance with applicable laws. Thus, with compliance with the regulatory framework and the mitigation measures below would ensure that impacts associated with removal of such materials would be less than significant.

(3) Underground Storage Tanks

(a) Potential UST within the Former Bus Maintenance Garage Area

A geophysical survey confirmed the presence of an anomaly that appears to be a waste oil UST at the site of the former bus maintenance garage located near the Transportation Building. As indicated above, soil sampling near the anomaly revealed low concentrations of PCE 5 feet below grade. Based on the shallow depth of the PCE, it is unlikely that the PCE SSL would be exceeded. However, any UST and associated piping and contamination encountered would be removed prior to or during construction in compliance with applicable regulatory requirements under the oversight of the LAFD and/or the RWQCB. Compliance with such regulatory requirements as set forth in the mitigation measure below would reduce potential impacts to a less than significant level.

(b) Former UST within Surface Parking Area

Recent soil sampling below the former 10,000-gallon gasoline UST removed from the surface parking area to the southwest of the science building revealed a concentration of MTBE in one sample 20 feet below grade that exceeded the SSL. The Site Assessment Report recommends no further action be required in regards to the former UST based on the impermeable soil lithology of the area and the distance from the soil contamination to the groundwater. It has been requested that RWQCB maintain case closure. The project proposes to construct a basketball court at this location. Construction of the basketball court would not require excavation greater than 5 feet. Therefore, construction activities would not encounter the MTBE impacted soil located approximately 20 feet below grade. In the event that MTBE impacted soils are encountered, compliance with the mitigation measures below would ensure that any potential impacts would be less than significant.

(4) Emergency Response and Evacuation

Emergency access to the site would continue to be provided via Stansbury Avenue and Camino de la Cumbre. In addition, emergency access within the site would be provided through the central portion of the site via the project's proposed pedestrian walkway, which would be maintained as a 20-foot clear Fire Department access route to accommodate emergency vehicles. As discussed in detail in Section IV.J, Transportation and Circulation, the new arrival plaza and parking facility would improve access to the site and eliminate queuing along Stansbury Avenue, which in turn would facilitate the movement of emergency vehicles. In addition, new wrought iron gates would be installed at the Stansbury Avenue and Camino de la Cumbre entrances, with the latter recessed by approximately 20 feet to eliminate an existing blind curve at the driveway. In the event that evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. Specifically, all students, faculty, and staff would gather in fire drill lines for attendance in the school parking lot. Students would then be escorted to the off campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street, just west of Hazeltine Avenue and north of Riverside Drive. School faculty and staff would facilitate the safe crossing of the students at major intersections. As part of these procedures, only emergency vehicles would be allowed on/off campus and parents would pick up their children at the off campus evacuation site. An alternate evacuation area has also been designated at the surface parking lot on Hazeltine and Ventura Boulevard.

Based on the above, the proposed project would not significantly affect the movement of emergency vehicles or cause substantial interference to emergency vehicle access and evacuation routes. As such, impacts associated with emergency access would be less than significant and no mitigation measures would be required.

4. MITIGATION MEASURES

With adherence to the requirements outlined in the regulatory framework above, the proposed project would result in less than significant impacts associated with hazardous materials. However, the following mitigation measures are recommended to ensure impacts remain less than significant.

Mitigation Measure F-1: Prior to demolition of any structure, the project applicant shall abide by the requirements of SCAQMD Rule 1403 for asbestos-containing materials (ACMs).

Mitigation Measure F-2: Removal of ACMs shall be performed by a certified asbestos containment contractor prior to demolition.

Mitigation Measure F-3: Removal of lead-based paints during demolition shall be performed by a certified lead containment contractor in compliance with applicable laws.

Mitigation Measure F-4: Prior to or at the time that development of improvements in the vicinity of the potential UST within the former bus maintenance garage area occurs, the potential UST and any associated piping and contamination shall be investigated and removed and/or remediated in compliance with applicable regulatory requirements.

Mitigation Measure F-5: Any contaminated soil, subsurface features, or groundwater discovered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ or otherwise managed in accordance with the applicable regulatory requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected until the appropriate evaluation and response measures are implemented so as to render the area suitable for grading activities to resume.

Mitigation Measure F-6: Any contaminated soils that may be stockpiled on-site shall be stored in a manner such that underlying soils are not cross-contaminated using such measures as heavy-duty plastic sheathing under or on top of the stockpiled soil or other suitable methods. In addition, all stock-piled materials shall be protected to prevent material from being washed into the storm drains using such methods as use of sand bags around the material or other suitable methods. The management, treatment or disposal of all contaminated soils shall comply with all applicable federal, state, and local regulations related to hazardous waste.

5. CUMULATIVE IMPACTS

All development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the simultaneous development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

All potentially significant impacts would be less than significant with implementation of the mitigation measures outlined above.

IV. ENVIRONMENTAL IMPACT ANALYSIS
G. HYDROLOGY

The following analysis of hydrology is based upon the Hydrology Study & Water Quality Report prepared by KPFF Consulting Engineers (KPFF), dated May 2006. This study is provided as Appendix I of this EIR.

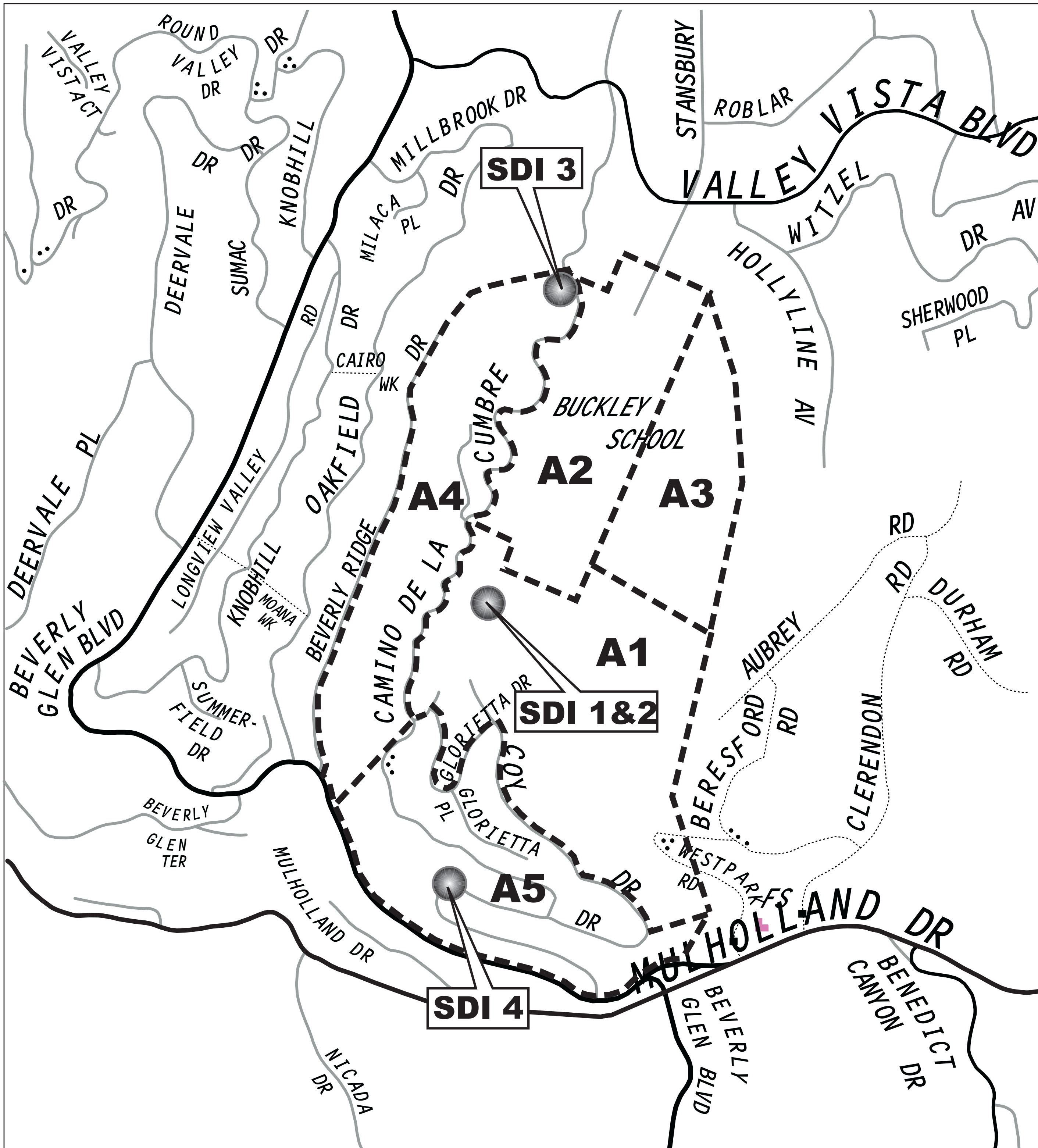
1. ENVIRONMENTAL SETTING

a. Existing Conditions

The project site is situated at the bottom of a filled-in canyon with relatively steep slopes of 40 percent and greater on three sides. The central, developed areas of the site are bordered on both the east and west with natural, vegetated slopes that rise at an average slope gradient of approximately 2:1, and the slope levels to approximately four percent northward in the developed area of the campus. Elevations on-site range from 750 feet above mean sea level (asl) in the northern portion of the project site to 900 asl in the southern portion of the site. The project site is presently developed with a variety of impervious surfaces, including school buildings, walkways, surface parking areas, playgrounds, and basketball courts. These developed surfaces constitute approximately 36 percent (or 6.59 acres) of the campus property. Pervious surfaces include an athletic field, landscaped areas, and the undeveloped canyon slopes, which together total approximately 64 percent (or 11.71 acres) of the site. Much of the off-site area surrounding the school is also vegetated and includes both undeveloped and residential properties.

Soils beneath the site consist of compacted and uncompacted fill, alluvium, residual soil, and bedrock. The fill consists of clayey sand material with gravel or slate that is moist and dense. Natural alluvial soils consisting of an upper layer of moist, firm, and porous silty clay; at depth, the alluvium is coarser, with silty sand, gravel, and small cobbles. Based on tests performed by the J. Byer Group (see Appendix F), the natural residual soil is considered surficially stable. Groundwater has been encountered at a depth of approximately 55 feet beneath the ground surface.

The project site lies within a 156-acre watershed, consisting of five sub-areas. These five sub-areas are shown in Figure IV.G-1 on page 245. The project site is located within sub-area 2, which totals approximately 20 acres and includes a small off-site undeveloped area. The main drainage line for the entire watershed is a reinforced concrete pipe, which was constructed before



SDI - Storm Drain Inlet

Note: Subareas and SDI locations are approximate

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Figure IV.G-1
Project Watershed Subareas

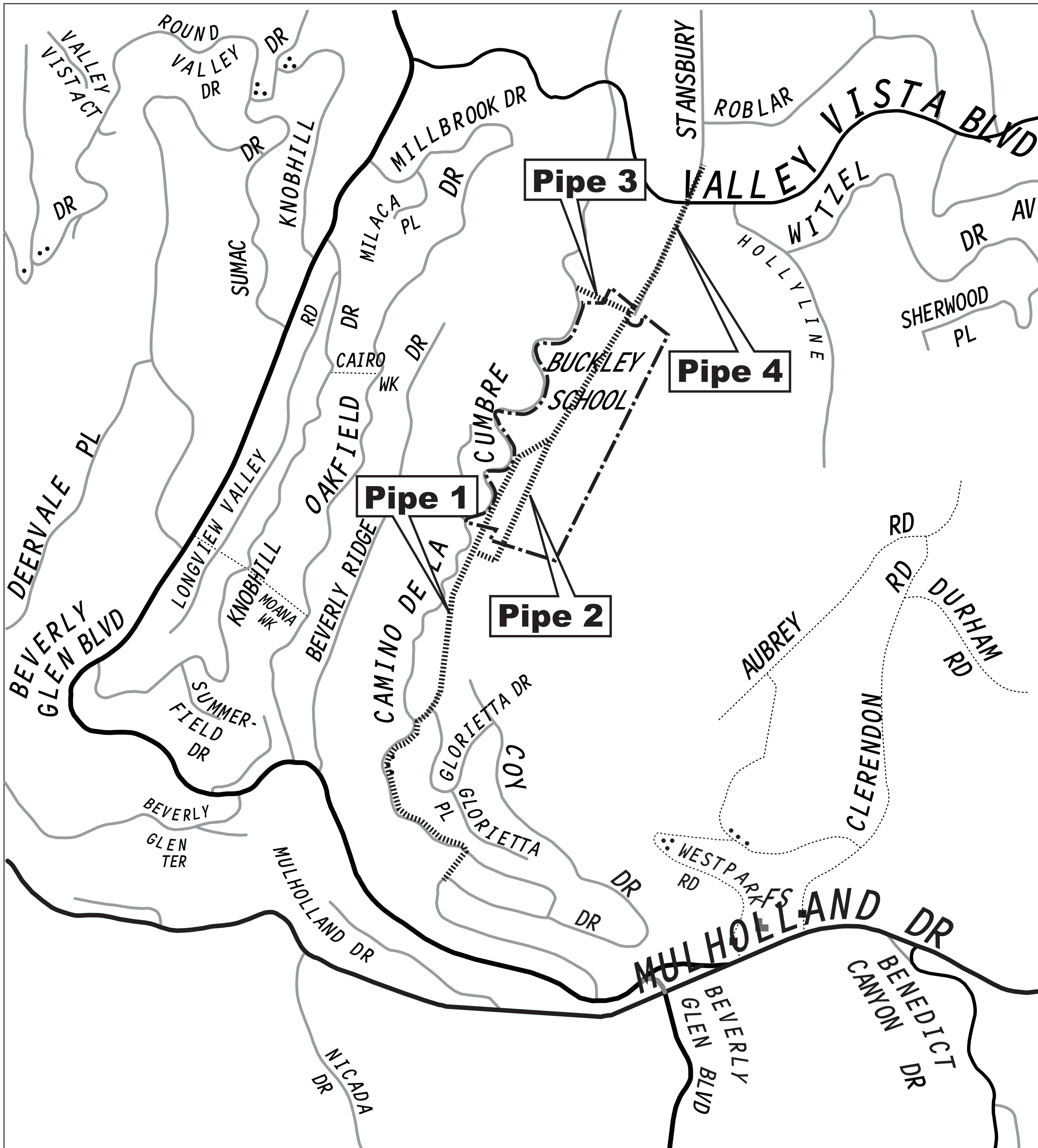
Source: KPFF Consulting Engineers and PCR Services Corporation, 3/2006.

1967 and is maintained by the Los Angeles County Department of Public Works (LACDPW). This main drainage line measures 51 inches as it traverses the project site along the extension of Stansbury Avenue and expands to 57 inches at Stansbury Avenue. Within the campus, the main line is located within a 20-foot wide sewer easement. The 51-inch portion of the line has a maximum hydraulic capacity of 394 cubic feet per second (cfs), while the 57-inch portion has a maximum hydraulic capacity of 529 cfs. The existing storm drain system that serves the watershed is also illustrated in Figure IV.G-2 on page 247.

During a 50-, 25-, and 10-year, 24-hour storm event, sub-area 2 (which consists primarily of the project site) receives approximately 7.50, 6.59, and 5.36 inches of rainfall, respectively. During a 50-year storm event, surface water runoff within sub-area 2 flows at a rate of 51.68 cfs, as shown in Table IV.G-1 on page 248. Most of this surface runoff is generated on-site. Based on site observations, the only off-site surface runoff that enters the site flows from the portion of sub-area 3 located adjacent to the athletic field. In general, the dense vegetation of the off-site contributing area reduces flow rates and naturally mitigates erosion, despite steep slopes. On-site surface runoff flows from the eastern and western sides of the site toward the central region of the campus and continues to drain downhill from south to north. Runoff flows for the project site are not collected at any specific point. Rather, runoff flows are conveyed via swales, gutters, drains, catch basins, and drainage pipes located throughout the campus to the main drainage line.

With the exception of that portion of sub-area 3 mentioned above, runoff from each of the other watershed sub-areas drains directly to the local drainage system without entering the project site as surface or sheet flow. In particular, sub-area 4, located directly west and upslope of the campus, drains to Camino de la Cumbre; flows are carried northward along the street to an 18-inch pipe that connects to the 51-inch main line near the terminus of Stansbury Avenue. Further description of the drainage patterns and infrastructure within each of the watershed sub-areas is provided in the Hydrology Study provided in Appendix I. It is noted that runoff from the hillside above Camino de la Cumbre sheet flows down the slope to the street in an uncontrolled (i.e., unimproved) manner, causing erosion. Heavy rains in early 2005 caused mudslides above Camino de la Cumbre, and there is evidence that mud and debris crossed the roadway to the chain link fence along the School's property boundary. In order to divert excess drainage and mud around the curve of the road, Buckley constructed a small berm and block wall along the edge of the road. As detailed in the Hydrology Study, the 18-inch line serving this off-site area is at capacity and may back up during larger storms. Please refer to the *Geologic and Geotechnical Engineering Report*, prepared by the J. Beyer Group, provided in Appendix F for further discussion of mudslides.

Flooding upstream of Camino de la Cumbre (specifically at the terminus of Camino de la Cumbre Place) was observed during heavy rains in early 2005. Based on data provided by the



Storm Drain Pipes

Project Boundary

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Figure IV.G-2
Existing Storm Drain System

Source: KPFF Consulting Engineers and PCR Services Corporation, 3/2006.

Table IV.G-1

Existing 50-Year Peak Runoff Rates in the Project Watershed

Watershed Sub-Area	Acreage	Flow (cfs)
1	61.00	146.55
2	20.00	51.68
3	26.00	65.64
4	25.00	49.61
5	24.00	63.04
Total		376.52

Source: KPFF, Hydrology Study & Water Quality Report for Buckley High School, May 2006.

City and County of Los Angeles and calculations performed by KPFF, the existing storm drain system is considered adequate to convey 50-year storm flows throughout the watershed, and lack of proper maintenance was most likely the cause of such off-site flooding in 2005.

b. Regulatory Framework

The Initial Study prepared for the proposed project, provided in Appendix B, determined that with adherence to applicable regulatory requirements, the project would not have long-term water quality impacts or violate water quality standards or waste discharge requirements. However, project-related construction activities would have the potential to affect surface water quality as the result of minor soil erosion (during grading and soil stockpiling) and subsequent siltation. As such, a summary of relevant water quality regulations is provided herein.

(1) Clean Water Act

Regulatory and permitting processes have been established to control the quality of water runoff from urban construction sites. In 1972, the Federal Water Pollution Control Act, also referred to as the Clean Water Act, was amended to require a National Pollutant Discharge Elimination System (NPDES) permit for discharges of pollutants to waters of the United States. The Clean Water Act was amended again in 1987 requiring the United States Environmental Protection Agency (USEPA) to create specific requirements for storm water discharges. In response to the 1987 amendments, Phase I of the USEPA NPDES Program required NPDES permits for: (1) municipal separate storm sewer systems generally serving, or located in, incorporated cities with 100,000 or more people (referred to as MS4 permits); (2) eleven specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or greater of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to (1) numerous small municipal separate storm sewer systems,

(2) construction sites of one to five acres, and (3) industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from storm water permitting.

Section 402 (p) of the Clean Water Act mandates that the MS4 permits must: (1) effectively prohibit the discharges of non-storm water to the storm water system except under certain provisions; and (2) require controls to reduce pollutants in discharges from the storm water system to the maximum extent practicable, including Best Management Practices (BMPs), control techniques, and system, design, and engineering methods.

A MS4 permit was issued to the County of Los Angeles and 84 incorporated cities (with the exception of the City of Long Beach) in December 2001.[123] To meet the Los Angeles County MS4 Permit requirements, municipalities are required to implement the Storm Water Quality Management Program that was prepared as part of the Report of Waste Discharge filed as part of the NPDES approval process. Pursuant to this program, municipalities, including the City of Los Angeles, are required to conduct a variety of activities including, but not limited to, the following:

- Control discharges at commercial/industrial facilities through tracking, inspecting, and ensuring compliance at facilities that are critical sources of pollutants;
- Implement a development planning program for specified development projects;
- Implement a program to control construction runoff from construction activity at all construction sites within its jurisdiction; and
- Implement a public agency activities program.

In accordance with the Los Angeles County MS4 Permit requirements, the City of Los Angeles has developed and completed several programs and activities, including the adoption of ordinances relating to storm water regulation and completion of a Development Best Management Practices Handbook (3rd Edition) regarding both construction and planning activities.

The California General Construction Activity Storm Water Permit, adopted by the State Water Resources Control Board (SWRCB) regulates construction activity that includes clearing,

[123] *County of Los Angeles Municipal Storm Water Permit (NPDES No. CAS004001, Order No 01-182).*

grading, and excavation resulting in soil disturbance of at least one acre of total land area.[124] This General Permit authorizes the discharge of storm water to surface waters from construction activities. It prohibits the discharge of materials other than storm water and authorized non-storm water discharges and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

The NPDES General Construction Permit requires that all developers of land where construction activities will occur on one acre or greater do the following:

- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the U.S.;
- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP), which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and
- Perform inspections and maintenance of all BMPs.

In order to obtain coverage under the NPDES General Construction Permit, a project applicant must submit a Notice of Intent (NOI) to the SWRCB and prepare a SWPPP. BMPs within the SWPPP typically regard minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction storm water management (e.g., the minimization of impervious surfaces, treatment of storm water runoff, etc). The SWPPP also must include a discussion of the program to inspect and maintain all BMPs.

The City of Los Angeles Development Best Management Practices Handbook, Part A Construction Activities, 3rd Edition, adopted by the City of Los Angeles Board of Public Works on September 29, 2004, and associated ordinances also have specific minimum BMP requirements for all construction activities and require that construction projects with one acre or greater of disturbed soil require the preparation of a SWPPP and filing of a NOI to comply with the State NPDES General Construction Permit with the SWRCB.

The Los Angeles County MS4 permit and the City of Los Angeles Development Best Management Practices Handbook also address water quality associated with project operations.

[124] *State Water Resources Control Board NPDES General Permit for Storm Water Discharges Associated with Construction Activity (NPDES No. CAS000002).*

However, as discussed above, the Initial Study determined that the proposed project would not have long-term water quality impacts or violate water quality standards or waste discharge requirements. Please refer to Appendix I for a discussion of associated operational regulatory requirements.

2. ENVIRONMENTAL IMPACTS

a. Methodology

As indicated above, this analysis of hydrology impacts is based on the Hydrology Study prepared by KPFF Consulting Engineers. The Hydrology Study was prepared based on a review of documents from and calculation methodologies specified by the Los Angeles County Department of Public Works (LACDPW). Storm drain diameter information was obtained from the City of Los Angeles Vault Records. Potential impacts to the storm drain system were analyzed by comparing the calculated runoff resulting from project implementation to the calculated drainage flow capacity of the storm drain system during 50-year storm events. A 50-year storm interval was selected for the analysis as directed in the LACDPW Hydrology and Sedimentation Manual (1990). Further information pertaining to the analysis methodology, including assumptions made in order to perform hydraulic calculations, is provided in Appendix I.

b. Threshold of Significance

The following factors affecting a determination of potential significance have been applied to the proposed project as are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis:

(1) Hydrology

- Cause flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or
- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

(2) Surface Water Quality

- Result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

c. Project Features

The Buckley School Campus Enhancement Plan would involve a net increase in impermeable surfaces due to the moderate increase in building footprint and new hardscape areas. New structures would generally be located within the previously developed areas of the campus, and the majority of grading would occur in developed or paved areas. Following project implementation, developed surfaces would constitute approximately 50.6 percent of the campus property (or 9.26 acres), and permeable landscaped areas would comprise approximately 49.4 percent (or 9.04 acres) of the site. This would represent an approximate 14.6 percent increase in impervious areas over existing conditions. As a result, a minor associated increase in surface water runoff would occur, as discussed further below. These post-project imperviousness numbers reflect a potential future circumstance in which artificial turf is introduced within the athletic field area, which would affect the amount of impervious area on-site and result in an increase in surface water runoff volume and velocity, as addressed below. As discussed in Section II, Project Description, of this EIR, The Buckley School is presently evaluating the feasibility of introducing artificial turf within the athletic field area. Artificial field surfaces generally require less maintenance than natural grass, do not require the use of fertilizers, and maintain an evergreen appearance for many years. However, artificial turf is not 100 percent permeable, as is natural grass. By assuming this potential future condition, the analysis presented herein provides the potentially highest volume (most conservative) scenario of hydrological impacts.

The project would also involve minor drainage improvements to connect to the existing local drainage system. Such improvements would potentially include new and/or modified swales, gutters, drains, catch basins, or drainage pipes. Modifications to the 51-inch main line traversing the site would not be necessary, and existing drainage patterns would generally be maintained.

Relative to construction activities, the project would implement a variety of BMPs to minimize erosion and sedimentation, eliminate runoff pollutants, and maintain post-construction water quality. Measures specific to erosion and sediment control would include soil stabilization, dust control, sediment control, and roadway cleaning practices. Please refer to Appendix I for lists of possible BMPs to be implemented. As discussed therein, final BMP selection would occur in the field prior to commencement of various construction activities, based in part on construction phasing and the time of year (which influences climatic conditions). Also refer to the Initial Study prepared for the project, provided in Appendix B, for discussion of plans and measures that would be implemented during construction and project operation in compliance with applicable regulatory requirements.

As part of the project construction plans, erosion control plans that specify temporary control measures would be implemented during construction. These plans would be updated as construction progresses and site conditions evolve. The temporary erosion control plans would be used in conjunction with the BMPs to be implemented.

d. Analysis of Project Impacts

(1) Construction

During construction, existing buildings and landscaping would be removed for improvements. As a result, underlying soils would be exposed, making the site temporarily more permeable. However, this increase in permeability would not have a substantial impact on existing drainage patterns and flows, particularly since grading and erosion control plans would be implemented along with appropriate BMPs.

More specifically, project construction would involve an estimated 15,674 cubic yards (cy) of cut material and an estimated 15,674 cy of fill, with nominal (i.e., less than 1,000 cubic yards) of soil import and/or export for a nearly balanced site in terms of earthwork.[125] As such, exposed soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site water activities to reduce airborne dust could contribute to pollutant loading in storm water runoff. However, as the construction site would be greater than one acre, the project would be required to obtain a NPDES general construction permit. In accordance with the requirements of the permit, the project would implement a Storm Water Pollution Prevention Plan (SWPPP), which would specify BMPs and erosion control measures to be used during construction to prevent storm water pollution. As provided in the Hydrology Study, BMPs to be utilized on the project site would include, but would not be limited to, stabilizing entrance areas with gravel, establishing a vehicle washing station, mulching, roughening of soil, placing detention basins, proper scheduling to avoid the rainy season, and establishing sediment traps. These BMPs would eliminate or reduce pollutant levels in storm water runoff during construction. Thus, with compliance of SWPPP guidelines including implementation of BMPs

[125] *The cut materials from throughout the site and a limited amount of imported soil would be used to fill in and raise the finished grade on the east side of the proposed Middle and Upper School Main Academic Center, along the campus driveway and new arrival plaza, as well as throughout the athletic field area.*

as set forth in the Hydrology Study, the project would not violate water quality standards. Construction-related impacts to hydrology and surface water quality would be less than significant.

If contaminated soils are encountered during earth-moving activities, appropriate measures shall be taken for the proper cleanup and/or disposal of the soil. Please see Section IV.F, Hazards, of this EIR for further discussion. In addition, the Initial Study prepared for the proposed project, provided in Appendix B, determined that project impacts on groundwater would be less than significant. Given the depth of groundwater (approximately 55 feet below ground surface) throughout the site, contact with groundwater is not expected during construction. For further discussion of subsurface conditions, refer to Section IV.E, Geology, of this EIR.

(2) Operation

As discussed above, project implementation would result in an approximate 14.6 percent increase in impervious area. Currently, the project site (or more specifically, watershed sub area 2, which consists of the site and a small off-site area) has a pre-project storm water runoff flow of 51.68 cfs during a 50-year storm event. Based on the Hydrology Study, the project's increase in impervious area would result in a post-development storm water runoff flow of 52.27 cfs, which represents a modest 1 percent increase in flow. The increase in flow would result in an estimated post-project discharge of 280 cfs and 377 cfs for the 51-inch line and the 57-inch line, respectively. Based on the maximum hydraulic capacity calculated for these pipes, the existing lines serving the site have available capacity to accommodate post-project flows. In addition, new minor drainage improvements such as new and/or modified swales, gutters, or drainage pipes would be provided on-site to ensure the proper flow of surface water to the 51-inch main line. Thus, the increase in surface water runoff from the project site subsequent to implementation of the proposed improvements would not cause flooding during a projected 50-year developed storm event, which would have the potential to harm people or damage property. In addition, this increase would not substantially increase the amount of surface water in a water body, nor produce a substantial change in the current or direction of water flow. Thus, the project's impacts on hydrology would be less than significant.

As discussed in the Initial Study (see Appendix B), project operations would be required to comply with the City's Standard Urban Storm Water Management Plan (SUSMP) requirements. Under the SUSMP, the project would be required to ensure that post-project storm water runoff rates would not exceed pre-project rates such that downstream erosion would occur. As provided in the City's Development Best Management Practices Handbook, SUSMP requirements include, but are not limited to, the following: minimizing storm water pollutants of concern; providing storm drain system stenciling and signage; containing properly designed outdoor material storage areas; containing trash storage areas; and providing proof of ongoing BMP maintenance. Furthermore, new land uses and activities would not be introduced, and the modest increase in surface water flows resulting from project implementation would not substantially increase pollutant loading in existing storm water discharge. With adherence to SUSMP requirements, operational impacts to surface water quality would be less than significant.

3. CUMULATIVE IMPACTS

As identified in Section II, Environmental Setting, of this EIR, there are 29 related projects within proximity of the proposed project. These projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed project, all of the related projects would also be subject to State NPDES permit requirements for both construction and operation. Each project would be required to develop SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface water quality. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to assure that sufficient local and regional drainage capacity is available. Furthermore, none of the related projects are located within the project’s watershed. Thus, cumulative impacts to hydrology and surface water quality would be less than significant.

4. MITIGATION MEASURES

The proposed project would be subject to the regulatory requirements described above, including preparation of a SWPPP and compliance with SUSMP requirements. Compliance with these requirements is mandated by law to ensure that impacts to hydrology and surface water quality are reduced to less than significant levels. As the proposed project is not anticipated to result in any significant impacts to hydrology and surface water quality, no mitigation measures would be required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to hydrology and surface water quality would be less than significant; therefore, no mitigation measures would be required.

IV. ENVIRONMENTAL IMPACT ANALYSIS
H. LAND USE

1. ENVIRONMENTAL SETTING

a. Existing Conditions

The project site is located within the Sherman Oaks community of the City of Los Angeles, approximately 13 miles northwest of downtown Los Angeles and 12 miles northeast of the Pacific Ocean. As described in Section II, Project Description, of this EIR, the project site consists of the existing approximately 18.3-acre Buckley School campus, located at 3900 Stansbury Avenue.

The approximately 18.3-acre Buckley School campus was formerly developed as the Glen-Aire Country Club. After purchasing the land in 1964, Dr. Isabelle Buckley moved the Buckley School to its current location in the late 1960s, and campus buildings were constructed through the late 1970s. The existing Buckley School campus includes approximately 99,150 square feet of building area for instruction, administration, extra curricular events, and storage. A surface parking lot located in the northern portion of the campus provides parking for 214 vehicles. In addition, there is a basketball court and an athletic field located in the southeast portion of the site. As shown in Figure II-3 in Section II, Project Description, a portion of the existing outdoor basketball court and weight training area currently crosses the eastern property line of the school property. The academic and associated buildings that comprise the core of the Lower, Middle, and Upper Schools are located on what is referred to herein as the Main Academic Campus, which is differentiated from uses and structures located at a higher elevation within the athletic field area, referred to as Gilley Field. The Buckley School also owns a non-contiguous 12.6-acre property to the south that is vacant and is not actively used.

Uses surrounding the project site consist of low density, single-family residential uses to the north and west, and the undeveloped Fossil Ridge Park owned by the Santa Monica Mountains Conservancy (SMMC) to the east and south. Additional residential uses are located further east and south of the park. Figure IV.H-1 on page 257 shows the existing land uses in the project vicinity. Due to its canyon location on the northern side of the Santa Monica Mountains, the topography of the site varies from approximately 750 feet above mean sea level (asl) within the northern part of the project site to more than 900 feet (asl) within the southern portion of the site. Primary access to the site is provided via Stansbury Avenue from the north. In addition, within the western portion of the site, a driveway provides secondary access via Camino de la Cumbre.

Source: PCR Services Corporation, 2006

PCR

Figure IV.H-1
Project Site & Surrounding Land Uses

b. Regulatory Framework

(1) Local

At the local level, several plans and regulatory documents guide development of the project site. The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan implements land use policy standards of the City of Los Angeles General Plan, and the City of Los Angeles Municipal Code (LAMC) governs land use through building standards and development restrictions. The project site is also subject to the Mulholland Scenic Parkway Specific Plan, which guides development throughout the Mulholland Drive corridor. These plans and regulatory documents are described below.

City of Los Angeles General Plan

The General Plan of the City of Los Angeles is a policy document originally adopted in 1974 that serves as a comprehensive, long-term plan for future development of the City. The General Plan is comprised of eleven elements that apply citywide and the Land Use Element, which is made up of 35 local area plans, known as Community Plans, as well as plans for the Los Angeles World Airport and Port of Los Angeles. Development on the project site is subject to the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (the Community Plan). Pursuant to state law, the Community Plan is consistent with the other elements and components of the General Plan. The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan was first adopted in 1988 and was last updated on May 13, 1998. The intent of the Community Plan is to promote an arrangement of land uses, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live in the community. The Community Plan sets forth goals, objectives, policies, and programs to meet the needs of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass community through the year 2010.

Major issues addressed in the Community Plan include the preservation of residential neighborhoods, enhancement of the Community's identity, maintaining infrastructure capacities, and general land use compatibility issues. More specifically, the Community Plan includes a policy that directly applies to the proposed improvements on The Buckley School campus, stating: "expansion of existing schools should be preferred over acquisition of new sites."[126] Additionally, while the project is not a residence, due to the site's location adjacent to a residential area along with its residential designation (discussed below), several of the land use policies for residential development presented within the Community Plan may be applied to the

[126] *Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, Policy 6-1.5, May 13, 1998, page III-14.*

project site, as detailed in Table 1 in the analysis below. The Community Plan also presents land use policies for public facilities, including schools. While The Buckley School is a private school located on privately-owned land, a few of the Community Plan policies for public schools may be applied to the project site. These include Policy 6-1.5 (cited previously) and are provided in Table IV.H-1 on page 277.

As shown in Figure IV.H-2 on page 260, the Community Plan designates the majority of the approximately 18.3-acre Buckley School campus for Minimum Density Residential uses and a small portion, located just east of Camino de la Cumbre, for Very Low Residential uses. The Community Plan also includes a notation identifying private elementary, junior high, and senior high school uses within the project site. The adjacent Fossil Ridge Park is also designated for Minimum Density Residential uses. Furthermore, the Community Plan shows a "desirable open space" boundary for much of the land surrounding the project site, including the very westernmost portion of the site, as shown in Figure IV.H-2.[127]

Chapter V of the Community Plan addresses urban design standards, the intent of which are to promote good design, create a visually pleasing and functional environment, and enhance the quality of life throughout the Community. Standards and improvements are recommended for individual projects as well as streetscapes and public spaces. However, the Mulholland Scenic Parkway Specific Plan and its associated Design and Preservation Guidelines (both discussed below) contain more specific design standards and guidelines than the urban design standards within the Community Plan; therefore, an exhaustive list of such applicable policies is not provided herein.

Los Angeles Municipal Code (LAMC)

As shown in Figure IV.H-3 on page 261, the project site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside) by the City of Los Angeles Planning and Zoning Code (Chapter 1 of the LAMC). Private schools are permitted within the RE zone by Conditional Use Permit (CUP), through which design and/or operational conditions of use may be imposed and enforced by the City.[128] The existing school uses are permitted and operated on the site pursuant to a CUP approved in 1965 and modified in 1987 by the City of Los Angeles Planning Commission. In the City of Los Angeles, numerous private schools are located on

[127] *As set forth in the Community Plan, Desirable Open Space is land that possesses open space characteristics which should be protected and where additional development controls are needed to conserve such characteristics. These lands may be either publicly or privately owned. Conservation of such characteristics is needed to ensure the usefulness, safety and desirability of adjacent lands and to maintain the overall health, safety, welfare and attractiveness of the community.*

[128] *Los Angeles Municipal Code, Zoning Code, Section 12.24.U.24.*

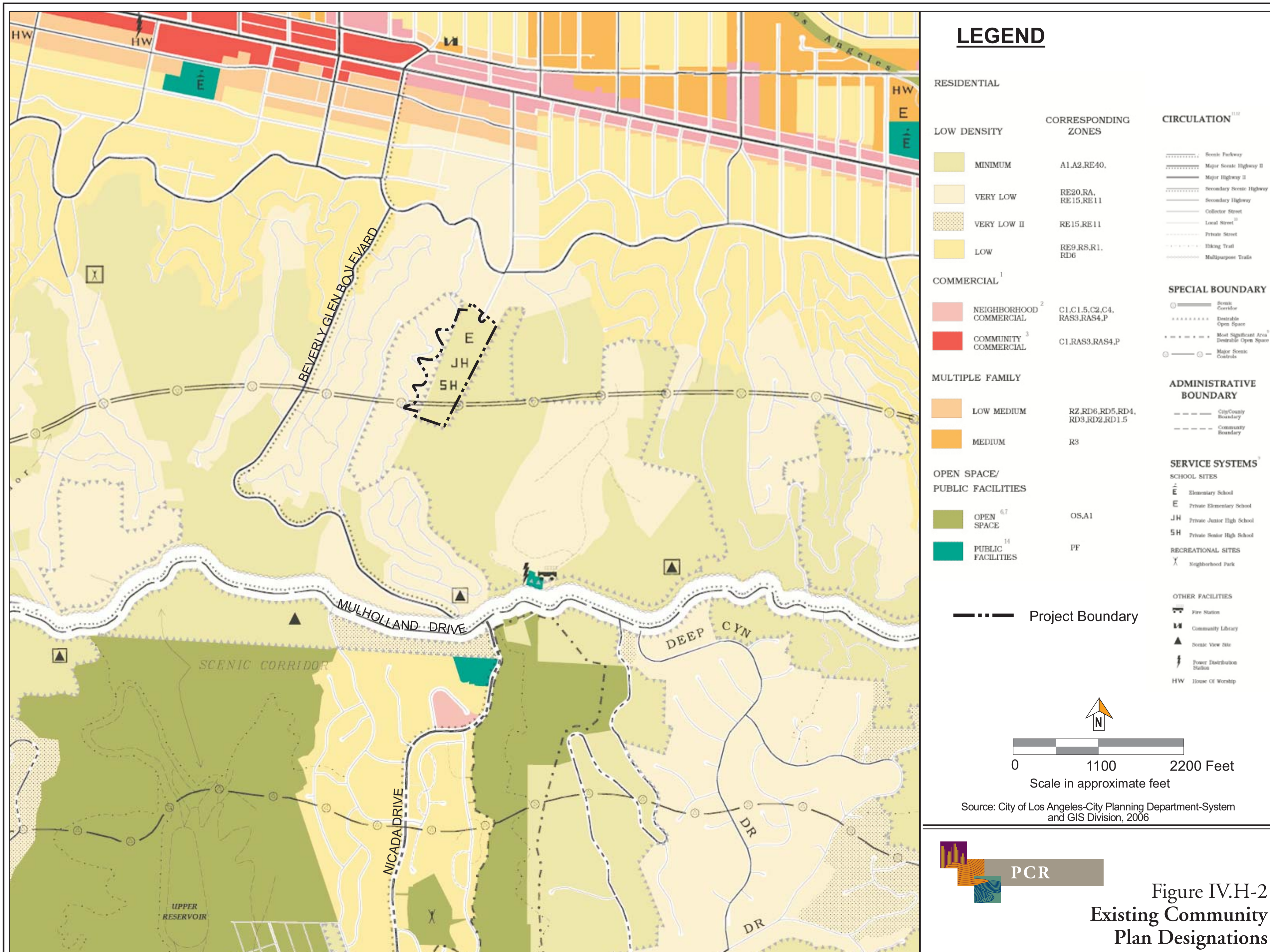

Figure IV.H-2
Existing Community Plan Designations

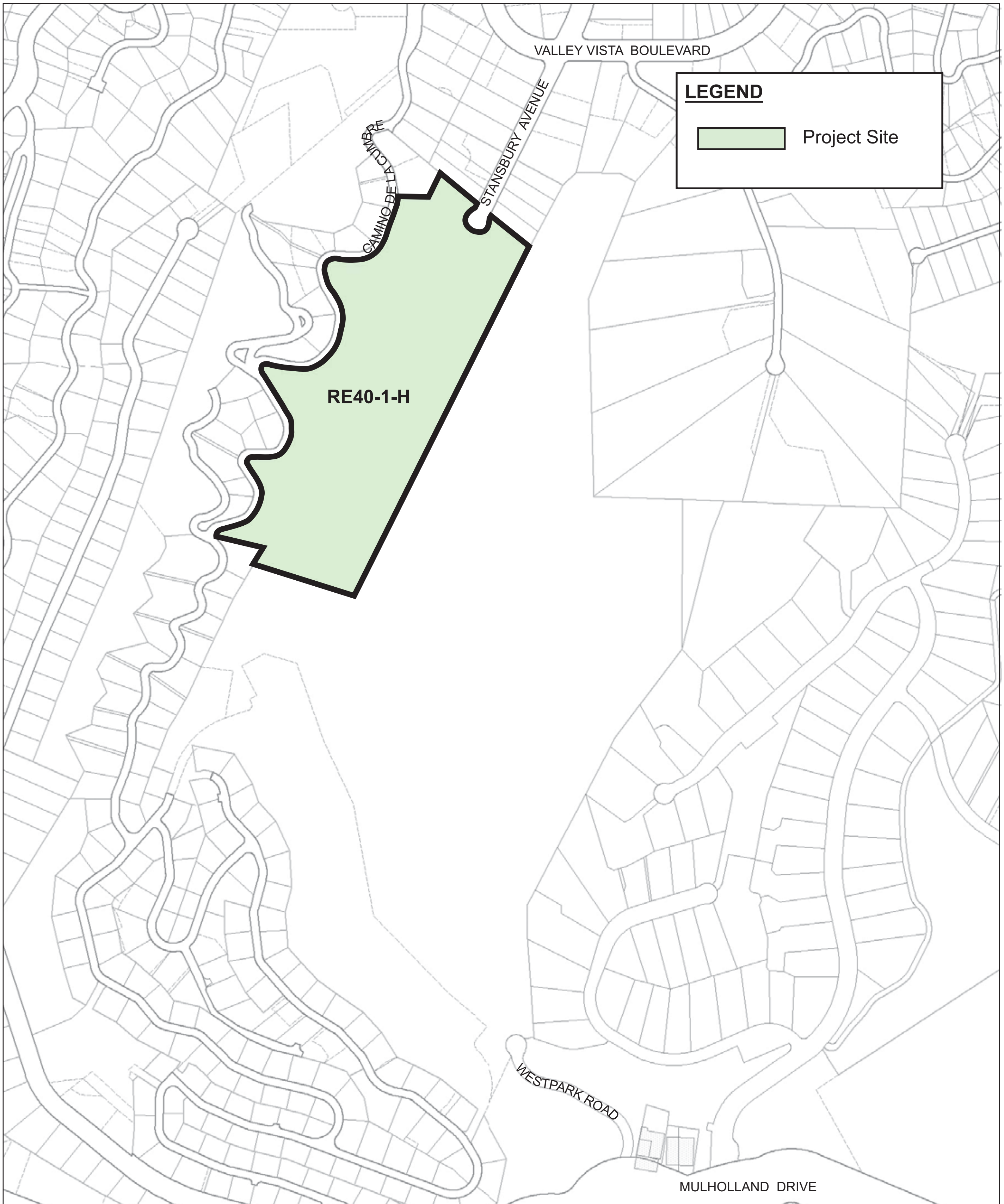

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Figure IV.H-3
Existing Zoning

Source: PCR Services Corporation, 2006

properties zoned for residential uses, reflecting the need for schools to be located in residential areas in order to serve a local population.[129]

The RE40-1-H zone requires a minimum lot size of 40,000 square feet and a minimum lot width of 80 feet.[130] Height District 1 indicates that properties within this zone shall have a maximum floor area ratio (FAR) of 3:1 and are limited to building heights of 45 feet above grade, unless further limited by other regulations.[131] The "-H" designation indicates that the site is located in a hillside area and would be subject to the City's hillside requirements, including the Hillside Grading Ordinance and maximum building heights of 36 feet above grade. Additionally, LAMC §16.05 requires that any development project which results in an increase of 50,000 gross square feet or more of nonresidential floor area be subject to Site Plan Review by the City. The adjacent Fossil Ridge Park is designated A1-1-H (Agriculture, Height District 1, Hillside).

Mulholland Scenic Parkway Specific Plan

The Mulholland Scenic Parkway Specific Plan was adopted on May 13, 1992, as part of the City's General Plan in order to protect the views and natural character of Mulholland Drive along the crest of the Santa Monica Mountains. A buffer area including and paralleling much of Mulholland Drive has been designated as the Mulholland Scenic Parkway. The Specific Plan establishes land use controls, including standards for projects proposed within the Scenic Parkway, as well as a design review process. The purposes of the Specific Plan are:

- To assure maximum preservation and enhancement of the parkway's outstanding and unique scenic features and resources.
- To preserve Mulholland Drive as a slow-speed, low-intensity drive.
- To preserve and enhance land having exceptional recreational and/or educational value.

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[129] *A partial list of private schools that are located in or adjacent to residential areas includes: Notre Dame High School in Sherman Oaks; The Archer School for Girls, Berkeley Hall, Brentwood School, Curtis School, Milken High School, Mirman School, St. Martin of Tours, and Westland School, all in Brentwood; John Thomas Dye, Marymount High School, Harvard-Westlake Middle School, and Stephen S. Wise Temple Elementary School, all in Bel Air; Campbell Hall Episcopal and Harvard-Westlake Upper School, both in Studio City; The Wesley School and Oakwood Elementary and Secondary Schools in North Hollywood; and Crespi Carmelite High School and Our Lady of Grace in Encino. Numerous other private schools are located in other residential communities throughout the City.*

[130] *Los Angeles Municipal Code, Zoning Code, Section 12.07.01.*

[131] *Los Angeles Municipal Code, Zoning Code, Section 12.21.1.*

- To assure that land uses are compatible with the parkway environment.
- To assure that the design and placement of buildings and other improvements preserve, complement and/or enhance views from Mulholland Drive.
- To preserve the existing residential character of areas along and adjoining the right-of-way.
- To minimize grading and assure that graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains.
- To preserve the natural topographic variation within the Inner and Outer Corridors.
- To reduce the visual intrusion caused by excessive lighting.
- To minimize driveway and private street access into the right-of-way.
- To preserve the existing ecological balance.
- To protect prominent ridges, streams, and environmentally sensitive areas; and the aquatic, biologic, geologic, and topographic features therein.
- To protect all identified archaeological and paleontological resources.
- To provide a review process of all projects which are visible from Mulholland Drive to assure their conformance to the purposes and development standards contained in the Specific Plan and the Landform Grading Manual.

The Specific Plan prescribes numerous special regulations that address site use, building design, and construction procedures for all projects located within the Mulholland Scenic Parkway. Specific Plan requirements supplement and in some cases supersede the requirements of the City's Zoning Code. The Specific Plan designates a 500-foot buffer from the right-of-way along both sides of Mulholland Drive as the Inner Corridor of the Specific Plan area. The area extending 0.5 miles from the Mulholland Drive right-of-way, excluding the Inner Corridor, is designated as the Outer Corridor of the Specific Plan area. The Specific Plan also designates an Institutional Use Corridor (within the Inner Corridor), which provides for uses such as schools, churches, and accessory buildings.[132]

[132] *The Institutional Use Corridor extends from the centerline of Corda Drive on the west to the centerline of Roscomare Road on the east, excluding the San Diego Freeway.*

The southern portion of The Buckley School campus lies within the Outer Corridor of the Specific Plan, as shown in Figure IV.H-4 on page 265. The Specific Plan does not provide for school uses within the Outer Corridor; however, The Buckley School has been at its current location since the 1960s, prior to the adoption of the Specific Plan, and therefore is considered a legal non-conforming use under the Specific Plan and the City's Zoning Code. The southern portion of Fossil Ridge Park also falls within the Outer Corridor. The Specific Plan specifies a height limit of 40 feet for buildings located within the Outer Corridor. However, as indicated above, the project is subject to the LAMC's more restrictive height limit restriction of 36 feet for structures within a hillside residential area. The Specific Plan also sets forth grading provisions and environmental protection measures regarding prominent ridges, streams, parklands, oak trees, and archaeological and paleontological resources, as discussed further in the analysis below.

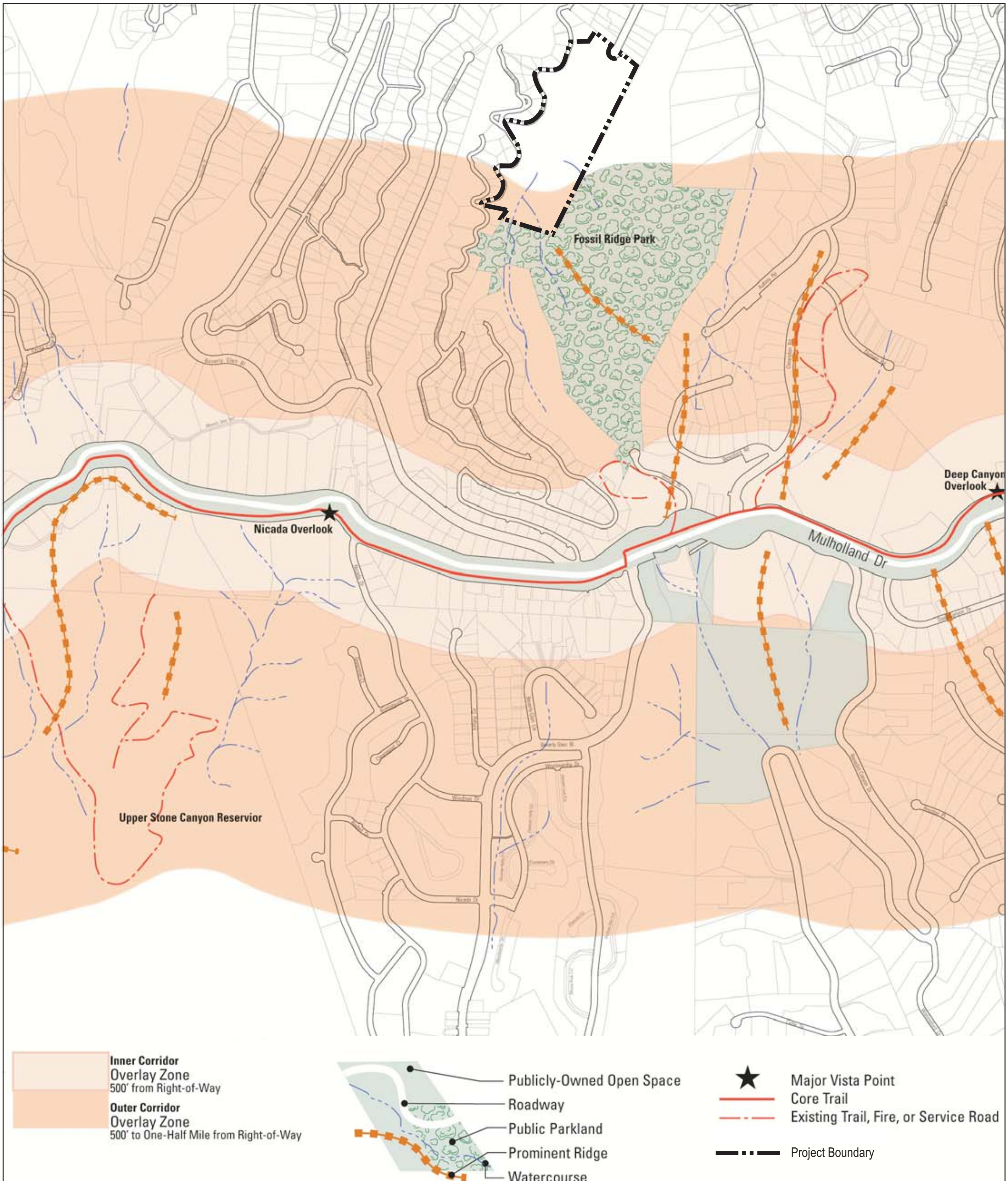
In addition to the Specific Plan itself, the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines, adopted May 22, 2003, provide guidance for the design review process and state goals, objectives, and guidelines that implement the Specific Plan. As stated in the Design and Preservation Guidelines:

> These guidelines do not create entitlements, nor are they mandatory requirements. They provide direction on how the Mulholland Scenic Parkway can best be preserved while allowing appropriate development, and clarify what can be expected when a project is reviewed by the Design Review Board and the Director. They recognize that individual projects and sites are different and present numerous and different design challenges. The guidelines do not require or expect every project applicant to address all the guidelines. An applicant should address the guidelines that are applicable to the proposed project and site conditions.[133]

The Design and Preservation Guidelines include recommendations for site planning, architecture, landscape, utilities, and utility-related structures. The following provisions within the Mulholland Scenic Parkway Design and Preservation Guidelines are relevant to the proposed project and this land use analysis:

> **Guideline 1:** Minimize the amount of grading and the use of retaining walls. Design structures and grading to fit the natural topography and existing conditions of the site, rather than making changes in the topography to accommodate the

[133] *City of Los Angeles, Mulholland Scenic Parkway Specific Plan—Design and Preservation Guidelines, May 22, 2003, page 4.*



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Source: City of Los Angeles, Mulholland Scenic Parkway Specific Plan and PCR Services Corporation, 2006.

Figure IV.H-4
Mulholland Scenic Parkway Specific Plan Area

structure. Incorporate natural slopes and deep-rooted native plants in the project to control erosion and undermining of slopes.

Guideline 2: When a building is situated on a site with a slope greater than 25 percent, the building should utilize a stepped profile in which no portion of the building exceeds 25 feet in height as measured from adjacent natural grade to the top of the roof or parapet wall directly above. Minimal grading and cut foundations should be utilized instead of extensive grading, filling, and retaining walls to create a building pad. Design the roof to follow the predominant slope of the land.

Guideline 5: The total non-permeable surfaces (driveways, patios, pool decks and building footprint) should be minimized in all projects and should not exceed 50 percent of the lot area. Project design should incorporate features such as fire-resistant wooden decks, driveway pavers, grass-crete and other permeable surfaces in order to maximize the amount of water that can percolate into the soil on-site and minimize overland runoff onto adjoining properties, streets, and watercourses.

Guideline 10: The Specific Plan limits the maximum quantity of grading that can be approved without a Specific Plan Exception. Proposed grading projects that are within these limits may still be recommended for disapproval if the amount and/or design of grading impacts the scenic resources of Mulholland Drive, is incompatible with the natural contours of the mountain terrain, or is incompatible with the Parkway environment.

Guideline 16: In accordance with the purposes of the plan to protect environmentally sensitive areas and topographic features, the [Design Review Board] will be carefully reviewing projects near any public parkland. No project is to be erected and no earth shall be graded within 200 feet of the boundaries of any public parkland without the Director making the five specific findings required by the Specific Plan Ordinance.[134] Avoid construction activities that would adversely affect the use and enjoyment of parkland by the public. A parkland is any publicly-owned or publicly-operated property that is used by the public for recreational, open space or preservation purposes. Parklands specifically include city parks, state parks, Santa Monica Mountains Conservancy

[134] *As specified within the Mulholland Scenic Parkway Specific Plan, projects located in the Inner and Outer Corridor and within 200 feet of public parkland may be approved under the following conditions: (a) the project preserves the residential character along the right-of-way; (b) the project will minimize erosion; (c) the project preserves the natural vegetation and the existing ecological balance; (d) the project protects identified archaeological and paleontological sites; and (e) the project minimizes driveway access into the right-of-way.*

lands and public trails, and the Santa Monica Mountains National Recreation Area of the National Park Service.

Guideline 33: The building footprint, including all structures 6'-0" or more above grade, should have a low ratio to the total lot area, and should cover less than 60 percent of the area within the first 15'-0" from the front yard property line.

Guideline 50: The size (total square footage, including garage and height), appearance, color and setback of existing homes, as well as the grading and landscaping of the lots on which they are constructed, will be considered for purposes of project compatibility with the existing neighborhood.

The Design and Preservation Guidelines also include guidelines regarding aesthetics and views. For an analysis of the project's consistency with these guidelines, refer to Section IV.A, Aesthetics, of this EIR.

(2) Regional Plans

Regional land use plans that encompass the project area include the Southern California Association of Governments' (SCAG) Regional Comprehensive Plan Guide (RCPG), which addresses regional development and forecasts growth for cities under its jurisdiction; and the Los Angeles County Congestion Management Plan (CMP), administered by the Metropolitan Transport Authority (MTA), which regulates regional traffic issues. In addition, the South Coast Air Quality Management District (SCAQMD) administers the Air Quality Management Plan (AQMP), which addresses attainment of State and federal ambient air quality standards throughout the South Coast Air Basin.

SCAG Regional Comprehensive Plan and Guide

SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's responsibilities include preparation of the RCPG in conjunction with its constituent members and other regional planning agencies.[135] The RCPG is intended to serve as a framework for decision-making with respect to regional growth that is anticipated through the year 2015 and beyond, including growth management and regional mobility. In addition, the RCPG proposes a voluntary strategy for local governments to use in addressing issues related to future growth and in assessing the potential impacts of proposed development projects within the

[135] *Major portions of the Plan (e.g., the Growth Management Section) were originally approved in 1994 and reprinted in the 1996 version.*

regional context. For planning purposes, the SCAG region has been divided into 14 subregions. The project site is located within the Los Angeles City subregion.

SCAG reviews environmental impact reports of regionally significant projects to determine consistency with regional plans. The criteria for determining whether a project is regionally significant are set forth in CEQA Guidelines §15206. The proposed project does not meet the criteria of §15206 with regard to its size and therefore is not considered regionally significant. Nonetheless, RCPG policies that relate to the proposed project are discussed in the analysis of impacts below.

SCAQMD Air Quality Management Plan

SCAQMD was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act. The SCAQMD is responsible for bringing air quality in the South Coast Air Basin (Basin) into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. The SCAQMD's AQMP, last amended in 2003, presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control measures aimed at reducing emissions. Further discussion of the AQMP can be found in Section IV.B, Air Quality, of this EIR.

MTA Congestion Management Program

The Los Angeles County Metropolitan Transportation Authority administers the CMP, a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. The CMP, revised in 2004, includes a hierarchy of highways and roadways with minimum level of service standards, transit standards, a trip reduction and travel demand management element, a program to analyze the impacts of local land use decisions on the regional transportation system, a seven-year capital improvement program, and a county-wide computer model used to evaluate traffic congestion and recommend relief strategies and actions. CMP guidelines specify that those freeway segments to which a project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of designated CMP roadway intersections to which a project could add 50 or more trips during either peak hour. The CMP is discussed further in Section IV.J, Transportation and Circulation, of this EIR.

2. ENVIRONMENTAL IMPACTS

a. Methodology

The analysis of potential land use impacts considers consistency of the project with adopted plans and policies that regulate land use on the project site, as well as the compatibility of proposed uses with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the planning documents identified above.

The determination of compatibility with surrounding uses is based on a comparison of land use relationships in the project area under existing conditions at the time of the NOP to the conditions that would occur following implementation of the project.

b. Threshold of Significance

The following factors affecting a determination of potential significance will be applied to the proposed project as are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," for consideration on a case-by-case basis:

(1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment plan, or specific plan for the site; and
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Based on the factors presented above, the project would be considered to have a significant land use consistency impact if it was found to be in substantial conflict with either the adopted Community Plan, Specific Plan, or with the whole of relevant environmental policies in other applicable plans.

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within the area;
- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and

- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

Based on the factors presented above, the project would be considered to have a significant land use compatibility impact if it would substantially and adversely change the existing relationships between numerous land uses or properties in a neighborhood or community or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

c. Project Features

The proposed project includes the demolition of six existing buildings, the construction of five new/replacement buildings, addition to and/or renovation of several existing buildings to remain, a central plant, and construction of an enclosed parking facility. Upon completion, a total of 168,650 square feet of classroom, specialized instruction, administration, and school-related athletic facilities would be located on-site, representing an increase of approximately 69,500 square feet when compared with existing conditions.

In addition to the project characteristics described in Section II, Project Description, of this EIR, the following project features related to land use are proposed as part of the project and supplement the Project Description:

- The use of the property shall be limited to the operation and maintenance of The Buckley School, a private coeducational institution for elementary and secondary school students, and educational, recreational, cultural, athletic, civic, and extracurricular activities related thereto, including but not limited to athletic events and practices, after-school programs, rehearsals, performances, school dances, celebrations, Commencement, and meetings and events for school stakeholders.

- The authorized use shall be conducted at all times with due regard for the residential character of the surrounding area and the right is reserved to the City Planning Commission to impose additional corrective conditions if, in its opinion, such conditions are necessary for protection of persons using the school or residents of the area.

- The total floor area of buildings on the subject property shall be limited to 168,650 square feet, as defined by LAMC §12.21.1 A.5 and §12.21.1 B.4, upon completion of all phases of permitted development. In addition, the project would be developed in substantial accordance with the following three-phase sequence provided, however, that landscape improvements may occur at any time:

- Phase 1 construction would be comprised of the new Library and Technology Center. The new Phase 1 building area shall not exceed 18,770 square feet.

- Phase 2 would be comprised of the new Middle and Upper School Main Academic Center and Parking Facility, replacement Guard House, new Central Plant, and new basketball court. New Phase 2 building area shall not exceed 61,570 square feet. As planned, Phase 2 would follow a period of approximately one year with no construction subsequent to completion of Phase 1; however, the possibility exists that some work for Phase 2 may overlap with completion of Phase 1.

- Phase 3 would be comprised of the new Academic Building West, addition to and renovation of the existing Academic Building South, new Aquatic Center, and renovation of Disney Pavilion and Lower School Buildings. New Phase 3 building area shall not exceed 15,510 square feet.

- The school shall be permitted to install and use a modular unit adjacent to the Academic Building South for food service during construction of Phases 1 and 2 and may install and use modular units with up to 26 classrooms and additional modular units for offices and restroom during the construction of Phase 2 to be located on Gilley Field. All modular units shall be promptly removed within 30 days of issuance of the certificate of occupancy for the new Middle and Upper School Main Academic Center and Parking Facility.

- The Aquatic Center is planned to be built entirely on the existing Buckley campus. However, as an alternative option, it may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future discussions with SMMC. In the event this alternative location is approved by SMMC, the Aquatic Center shall be permitted to be constructed across the eastern property line as shown in Figure IV.H-5 on page 272. The outdoor swimming pool shall be built to USAS/CIF regulation standards and would include a maximum of 240 bleacher seats.

- The campus hours shall be 7:00 A.M. to 8:30 P.M. Monday through Friday, with the following requirements and exceptions:

  - Classes shall occur Monday through Friday beginning no earlier than 7:30 A.M. and ending no later than 4:00 P.M.

  - The campus may be open for after-school programs, extra-curricular activities, school break athletic and performing arts programs, and meetings Monday through Friday from 4:00 P.M. until 8:30 P.M.

Figure IV.H-5
Conceptual Site Plan with Alternate Aquatic Center Location

Source: Jeffrey M. Kalban & Associates Architecture, Inc. 2006

- The campus may be open for extra-curricular activities and meetings until 10:30 P.M. on eight weekday nights (Monday through Friday) each month, not to exceed two nights per week, as well as some Saturdays from 8:00 A.M. to 11:00 P.M. and some Sundays from 10:00 A.M. to 8:00 P.M. for a combined 24 weekend days per year.

- Extra-curricular activities and events allowed during the weekdays, weekend days, school breaks, evenings and hours of permitted operation include, but are not limited to, the following: after-school programs; athletic practices and interscholastic athletic competitions; music, dance and dramatic performing arts preparations, rehearsals and performances; school dances; admission open houses and scholastic testing; Fifth Grade Celebration (Fifth Grade matriculation to Sixth Grade) and Upper School Commencement; the Buckley Annual Fair; parent/teachers conferences, parent education sessions and parents' association meetings; and trustees' meetings.

- The Buckley Annual Fair may be held on one weekend day each year, during which campus may be open from 7:00 A.M. to 11:00 P.M.

- The School shall be permitted to host up to a maximum of four interscholastic high school athletic tournaments each year involving more than two CIF schools provided the attending schools are direct participants. Any such tournament shall not be subject to the hours specified above, shall not count toward the eight permitted evenings per month, and shall not be counted as a day of instruction. However, such tournaments shall count toward one of the 24 weekend days if occurring on a Saturday and/or Sunday. For these four tournaments, the competitions may be allowed on up to five consecutive days or evenings and shall end by 11:00 P.M.

- The School shall be permitted to hold the Performing Arts productions on four consecutive evenings, Wednesday through Saturday until 10:30 P.M., in the fall and spring of each year. These productions shall not count toward the two weeknight limitation or the 24 weekend day limitation. On the subject performance evenings, the campus may close at 11:00 P.M.

- The School shall be permitted to hold one Upper School Dance each semester on a Friday or Saturday night. On these two occasions, the Upper School Dances shall end by 11:00 P.M., with campus closed by midnight. The School shall also be permitted to hold one Middle School Dance per year. The Middle School Dance shall occur on a Friday evening and shall end by 10:00 P.M., with campus closed by 11:00 P.M.

- The campus gates shall be closed and locked promptly after the end of permitted activities and at all times the campus is closed, provided, however, that faculty and staff may be allowed to enter or exit either the Stansbury or Camino de la Cumbre before or after hours provided that the campus gate is securely locked again after their entrance or exit. Additionally, the Stansbury gate may be opened for a 30-minute period to allow for unloading, pick-up by parents, and departure of students from buses that are unexpectedly delayed returning from away athletic or special events.

– To further the educational purposes of the School and to ensure the maintenance and security of the campus, faculty, staff, maintenance and security personnel may be present on the campus at any time.

- Notwithstanding the height limits established by §12.21 A.17(c) of the LAMC and Mulholland Specific Plan Section 6D, buildings and structures on the subject property shall be permitted to be up to 55 feet, 0 inches in height, as defined by §12.03 of the LAMC, which shall be measured from existing natural or finished grade, whichever is lower, in substantial conformance with the building site plan and elevations.[136]

In addition to these project features and project features listed in other sections of this EIR, the project would also include a new CUP pursuant to LAMC §12.07.01A.7 and §12.24U.24(b), as well as approval of a parcel map pursuant to LAMC §17.53 to create two legal lots. Parcel 1 would consist of approximately 10.6 acres in the northern portion of The Buckley School campus located beyond the boundary of the Mulholland Scenic Parkway Specific Plan Outer Corridor. Parcel 2 would consist of the southern approximately 7.7 acres of the campus located partially within the Outer Corridor.[137] The project would also require a Specific Plan Exception pursuant to LAMC §11.5.7F and MSPSP Section 3C for relief from the MSPSP Section 6A to allow the School's continued educational/institutional use and new facilities within that portion of the site located within the Specific Plan's Outer Corridor, after approval of the parcel map. In addition, a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F and a Modification of the height regulations pursuant to LAMC §12.24F to allow building heights up to a maximum of 55 feet would be required. Pursuant to MSPSP Sections 6B and 5B, the project would also require that Environmental Findings be made since the project would be located within 100 feet of streams as defined by the MSPSP, grading would occur within 200 feet of parklands as defined by the MSPSP, and oak trees would be removed. The project would also require a Modification of the height regulations pursuant to LAMC §12.24F to allow landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre entrances in lieu of the maximum three and one-half feet otherwise permitted in the front yard and six feet otherwise permitted in the

[136] *The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

[137] *The proposed lot line would not coincide exactly with the Mulholland Scenic Parkway Specific Plan Outer Corridor boundary.*

side yard in a hillside zone pursuant to LAMC §12.22C 20. Additionally, pursuant to LAMC §16.05, the project would require Site Plan Review findings for a development project resulting in an increase of 50,000 square feet or more of non-residential floor area. Finally, a Modification of yard regulations pursuant to LAMC §12.24F may potentially be necessary to allow the proposed outdoor Aquatic Center to occur within the required side yard along the eastern property line, subject to future discussions with SMMC.

d. Analysis of Project Impacts

(1) Consistency with Local Plans and Applicable Policies

Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

As discussed previously, the Community Plan designates the majority of The Buckley School campus for Minimum Density Residential uses, with a small portion of the campus located immediately east of Camino de la Cumbre designated for Very Low Residential uses. Continued use of the project site for school purposes would be consistent with this land use designation, as the corresponding RE-40 zone permits school uses by CUP. A description of the revised CUP proposed as part of the project is provided below in the analysis of project consistency with the LAMC. The Community Plan also includes a notation that private elementary school, junior high, and senior high school uses occur at this site; the project would not change the existing private school use at the site and thus would be consistent with the school notations for the property. In addition, no new structures would be developed within the portion of the campus designated as Desirable Open Space, thus preserving the site's undeveloped western hillside.

Relative to the general issues addressed in the Community Plan, the School would continue to operate within the existing campus and the project would not physically divide or interfere with the surrounding residential community; thus, the existing land use relationships in the area as well as the overall character of the neighborhood would be preserved. As discussed in detail in Section IV.A, Aesthetics, the design of the proposed facilities and new landscaping introduced on-site would enhance the visual character of the campus, be aesthetically compatible with the School's canyon setting, and generally improve the campus identity. As discussed in relevant analyses throughout Section IV, Environmental Impact Analysis, of this EIR, project implementation would not significantly affect the capacity of public infrastructure serving the site and surrounding area. Furthermore, as discussed below, the project would not result in significant land use compatibility impacts.

Table IV.H-1 on page 277 lists the applicable policies contained within the Community Plan, with a brief discussion that identifies the relationship between the project features and the policies. As indicated above, two policies relate directly to school development; the remaining policies pertain to residential uses and thus are not directly relevant to the project, but could apply to the project site in general. As indicated in Table IV.H-1, the project would be consistent with the policies in the Community Plan. In addition, the project would support Community Plan policies relating to other issues, such as open space (e.g., the project would retain passive and visible open space, thus providing a visual balance to the developed portions of the site) and transportation (e.g., the project would implement a Transportation Demand with programs for carpooling, busing, and other alternative means of transportation), as discussed in relevant sections throughout this EIR. Based on the above, the project would not conflict with the land use provisions of the Community Plan.

As previously described, the Aquatic Center is planned to be built entirely on the existing Buckley campus. As an alternative option, it may be built in the location of the current outdoor basketball and weight facility on a portion of land currently owned by the SMMC, subject to future negotiations with SMMC. Development of the Aquatic Center at this alternative site would allow the School to locate the facility in an area that is already disturbed and presently developed with school uses. Any analysis of a potential future agreement between The Buckley School and SMMC (e.g., granting of an easement, etc.) would be speculative at this point in the planning process. In any case, relative to the Community Plan, neither location for the Aquatic Center would disrupt existing land use patterns in the area, encroach upon residential uses, or alter the overall character of the campus or the surrounding neighborhood. As such, the project would be consistent with the Community Plan regardless of which of the locations of the Aquatic Center is ultimately selected.

Los Angeles Municipal Code (LAMC)

As indicated above, the project site is zoned RE40-1-H (Residential Estate, Height District 1) pursuant to the City of Los Angeles Planning and Zoning Code (Chapter 1 of the LAMC). The proposed project would not exceed the development standards specified for this zone. The floor area ratio of The Buckley School campus, at approximately 0.21:1, would be substantially less than the 3:1 permitted FAR. In addition, The Buckley School site exceeds the minimum lot area and width requirements of 40,000 square feet and 80 feet, respectively.

As indicated above, private schools are permitted within the RE zone by CUP, through which design and/or operational conditions may be imposed and enforced by the City. As discussed above, at the present time The Buckley School operates pursuant to CUP No. 17967, which permits a maximum enrollment of 750 students. The proposed Campus Enhancement Plan would require a new CUP for The Buckley School in order to allow a maximum enrollment of 830 students by the 2014–2015 school year, plus up to eight additional faculty members and up to eight other additional staff to accommodate student enrollment. (A resulting total of 117

Table IV.H-1

Project Consistency With Relevant Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

Policy	Consistency with Policy
Policy 6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character and as appropriate use schools to create a logical transition and buffer between different [uses], e.g., multiple family residential vs. single family residential.	The project would occur entirely within the existing campus, and new construction would be concentrated on the eastern side of the site, furthest from adjacent residences. The existing land use relationships in the area as well as the overall character of the neighborhood would be preserved. The design of the proposed facilities and new landscaping introduced on-site would be aesthetically and functionally compatible with existing development on-site and with the School's canyon setting.
Policy 6-1.5: Expansion of existing schools should be preferred over acquisition of new sites.	The project would be consistent with this policy, as the project would improve an existing school through the development of 69,500 net new square feet of floor area.
Policy 1-1.2: Protect existing single family residential neighborhoods from new, out-of-scale development.	The project would be consistent with this policy as it is designed with building heights and massing that are generally similar to existing building heights and scale. While the high point of the new Middle and Upper School Main Academic Center and Parking Facility would measure up to 55 feet in height from existing grade, it would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project. This maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. Regardless, no proposed roofline within the Main Academic Campus would occur above the existing Disney Pavilion roofline. In addition, new structures would be integrated into the existing topography of the site in areas that are generally already paved, landscaped, or developed with buildings, thus promoting compatibility of new development with the scenic character of the community.
Policy 1-1.3: Protect existing stable single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.	School uses are not considered incompatible with the site's residential land use designation nor with the surrounding residential uses. Use of the site for educational purposes has occurred by Conditional Use Permit since the late 1960s. Approval of the project would require approval of a new CUP permit, which would contain conditions ensuring that the School use remains compatible with the surrounding neighborhood. The project would be consistent with this Community Plan policy as the new and replacement buildings would be located within the existing Buckley School campus. Despite the net increase in floor area, the proposed school facilities would be spread throughout portions of the campus, making use of existing paved/disturbed areas, and would not create a visually dense development. Additionally, new construction would be concentrated on the eastern side of the site, furthest from adjacent residences. Implementation of a Transportation Demand Management (TDM) plan would minimize additional vehicle trips to the site, as discussed in Section IV.J, Transportation and Circulation.

Table IV.H-1 (Continued)

Project Consistency With Relevant Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

Policy	Consistency with Policy
	Furthermore, the project's parking and access improvements would eliminate vehicle queuing on Stansbury Avenue, thus improving land use compatibility with the adjacent properties.
Policy 1-1.4: Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design.	As previously mentioned, the design of the proposed facilities and new landscaping introduced on-site would enhance the visual character of the campus, be aesthetically compatible with existing development on-site and the School's canyon setting, and generally improve the campus identity. The project would respect the existing land use relationships in the area as well as the overall character of the neighborhood.
Policy 1-1.6: The City should promote neighborhood preservation, particularly in existing single family neighborhoods, as well as in areas with existing multi-family residences.	The project would support the City's efforts with regard to this Community Plan policy as the School would continue to operate within the existing campus and the project would not encroach upon the surrounding residential community. Thus, the existing land use relationships in the area as well as the overall character of the neighborhood would be preserved.
Policy 1-3.1: Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	Project development would be concentrated within existing developed, paved or otherwise disturbed areas of the site and would not substantially expand the campus beyond its existing building footprint. A landscape plan would be implemented to green the campus and improve views from off-site and would include landscaped islands within the arrival plaza, heavy landscaping along the campus entry drive, and a pedestrian-oriented walkway through the campus designed to be aesthetically compatible with the School's canyon setting.
Policy 1-3.2: Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.	Though not directly applicable to the project due to the residential focus of this Community Plan policy, elements of the policy can be applied to the project. Project implementation would involve a nominal increase in building density (discussed in the analysis of LAMC consistency). However, as previously mentioned, the design of the proposed facilities and new landscaping introduced on-site would enhance the visual character of the campus, be aesthetically compatible with existing development on-site and the School's canyon setting, and generally improve the campus identity. The project would respect the existing land use relationships in the area as well as the overall character of the neighborhood. Impacts on public facilities and traffic are addressed elsewhere within this EIR.
Policy 1-3.3: Preserve existing views in hillside areas.	The project would be consistent with this policy since it would not obstruct or substantially alter existing views in the surrounding area. Proposed building and roof heights would be generally similar to existing heights (i.e., no proposed rooflines within the Main Academic Campus would occur above that of the existing Disney Pavilion), and development would be located on already developed areas at the lower portion of a canyon. As analyzed in Section IV.A, Aesthetics, the project would not significantly impact views from the Mulholland Scenic Corridor or from other off-site public and private areas.

Table IV.H-1 (Continued)

Project Consistency With Relevant Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

Policy	Consistency with Policy
Policy 1-5.1: Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas.	The project would improve street circulation through the elimination of off-site queuing resulting from construction of the new enclosed Parking Facility and on-site queuing area within the arrival plaza. Implementation of a TDM plan would minimize additional vehicle trips to the site. In addition, as described in Section IV. J, Transportation and Circulation, operation of the proposed project would not result in any significant impacts to the local street system with incorporation of mitigation measures.
Policy 1-5.2: Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within hillside areas.	The project would be consistent with this policy as it is: (1) located in an area that has an adequate street circulation system that can accommodate operation of the project; (2) located in an area that has available infrastructure and public services that can accommodate the project; and (3) located on a property that is already developed with buildings, paving or landscaping. Refer to the Initial Study (provided in Appendix B of this EIR) for a discussion of utilities and public services, including sewers and fire protection. As discussed therein, the project would include appropriate fire safety improvements and comply with all applicable requirements, and fire protection services in the area are considered adequate to serve the project. As discussed in Section IV.G, Hydrology, the local storm drain system has available capacity to accommodate any increase in stormwater flows.
Policy 1-5.3: Consider the steepness of the topography and suitability of the geology in any proposal for development within the Plan area.	The project would be consistent with this policy. The project is located on a site that has been previously graded, and thus development of the new buildings would not require substantial modification to the existing topography. The enclosed Parking Facility has been specifically designed to minimize the amount of excavation and associated soil import/export required for the project. As analyzed in Section IV.E, Geology, of this EIR, the geology of the site is suitable for the proposed project.
Policy 1-5.4: Require that any proposed development be designed to enhance and be compatible with adjacent development.	The project would be consistent with this policy since it is generally recognized that school uses are necessary and appropriate in residential areas (discussed further below in the analysis of LAMC consistency). Educational uses have operated on the project in accordance with a CUP permit since the late 1960s. Approval of the project would require approval of a new CUP permit, which would contain conditions ensuring that the School use remains compatible with the surrounding neighborhood. In addition, as indicated above and described in detail in Section IV.A, Aesthetics of this EIR, new structures would be integrated into the existing topography of the site in areas that are generally already paved, landscaped, or developed with buildings. Building and roof heights would be generally similar to existing building heights (i.e., no proposed rooflines within the Main Academic Campus would occur above that of the existing Disney Pavilion), and a comprehensive

Table IV.H-1 (Continued)

Project Consistency With Relevant Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan

Policy	Consistency with Policy
	landscape plan would be implemented. Furthermore, the project's parking and access improvements would eliminate vehicle queuing on Stansbury Avenue, thus improving land use compatibility with the adjacent properties. Thus, the design of the project would promote compatibility of new development with the scenic character of the community.

full-time and 8 part-time faculty members (approximately 121 full-time equivalent (FTE)) and 51 full-time and 2 part-time staff (approximately 51 FTE) would be associated with The Buckley School by the 2014–2015 school year.) Under provisions of the new CUP, the campus would be open from 7:00 A.M. to 8:30 P.M. Monday through Friday, and regular classroom instruction would occur up to 220 days per year, with instruction beginning no earlier than 7:30 A.M. and ending no later than 4:00 P.M.[129] Additionally, as described in more detail in the project features above, the School would be open for extra-curricular activities and events until 10:30 P.M. on up to eight weekday nights (Monday through Friday) each month, not to exceed two nights per week, as well as some Saturdays from 8:00 A.M. to 11:00 P.M. and some Sundays from 10:00 A.M. to 8:00 P.M. for up to a combined 24 weekend days per year. Faculty, staff, maintenance and security personnel could continue to be present on-site at any time in order to optimally operate the school and ensure the safety of all students and the security of campus facilities.

As indicated by the LAMC, a CUP may be approved for private school uses upon a finding that:

> [T]he proposed location will be desirable to the public convenience or welfare, is proper in relation to adjacent uses or the development of the community, will not be materially detrimental to the character of development in the immediate neighborhood, and will be in harmony with the various elements and objectives of the General Plan.[130]

As previously discussed, the school has been appropriately located within the project site since the late 1960s; prior to that the site was occupied by the Glen-Aire Country Club.

[129] *Instruction of up to 220 days includes the regular academic year (180 days) plus the Summer Academic and Summer Enrichment Programs (six weeks).*

[130] *Los Angeles Municipal Code, Zoning Code, Section 12.24.E.*

Educational uses have thus been a part of the land use fabric of the local area for nearly 40 years. Within the City of Los Angeles, numerous private schools are located on properties zoned for residential uses, reflecting the need for schools to be located in residential areas in order to serve a local population. The LAMC acknowledges that schools can be sited in residential neighborhoods because the purpose of schools is to educate a subset of the residential population, namely, primary and secondary age students. Public school properties are for the most part located throughout the City of Los Angeles in residential neighborhoods, though most public school sites are zoned "Public Facility" due to public ownership. Private schools, on the other hand, are anticipated as a conditional use subject to issuance of a CUP in which specified conditions are intended to insure compatibility with nearby residential uses. As such, schools are a necessary and appropriate use in residential areas. As also discussed above, the project would be consistent with the Community Plan land use designations and thus the General Plan. With approval of the proposed CUP, the project would comply with applicable zoning requirements.

As the project site is located in a residential hillside zone, the project would be subject to the 36-foot maximum height limit pursuant to LAMC §12.21A 17(c). One existing structure and two of the proposed buildings, the Middle and Upper School Main Academic Center and the Academic Building West, would exceed this height limit.[131] As such, the project proposes a modification of the height regulations pursuant to LAMC §12.24F to allow some building heights up to a maximum of 55 feet. Much of the most visible façades of the Middle and Upper School Main Academic Center (i.e., the northern and western sides) would have low- to mid-rise rooflines measuring approximately 31.1 to 43.6 feet above finished grade, with building height increasing to the east. The high point of the building would occur on the eastern façade, which would not be visible to neighboring residential properties, and would measure up to 55 feet in height from existing grade.[132] However, the building would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project. This maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site, which would serve to nearly eliminate the need for soil export or import. In essence, the areas immediately east of the parking levels below the Middle and Upper School Main Academic Center would be filled in with soil materials graded or excavated on-site.[133] In addition, the

[131] *It is noted that two existing buildings (one of which would be removed as part of the project) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC §12.21A 17(c).*

[132] *The proposed building heights referenced throughout this document each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

[133] *Additionally, soil materials excavated on-site would be used as fill to raise the level of the athletic field by approximately 10 inches.*

Academic Building West would have a formal height of 39 feet as measured from existing grade; however, the building would visually appear no greater than 32 feet as measured from finished grade. In any case, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[134] All other proposed building heights would fall within the 36-foot height limit specified by the LAMC hillside requirements. With the approval of the height modification pursuant to LAMC §12.24F, the project would be consistent with applicable height regulations of the LAMC.

The project would also require a Modification of the height regulations pursuant to LAMC §12.24F to allow landscaping, hedges and fences/gates/walls up to 10 feet in height within the required yards at the Stansbury Avenue and Camino de la Cumbre entrances in lieu of the maximum three and one-half feet otherwise permitted in the front yard and six feet otherwise permitted in the side yard in a hillside zone pursuant to LAMC §12.22C 20. With approval of this height modification, the project would also be consistent with applicable regulations of the LAMC.

In the event that the alternative location for the proposed Aquatic Center (i.e., on the site of the existing outdoor basketball and weight facility at the northeast corner of the athletic field, on a portion of SMMC land) is utilized, the project would require a Modification of the yard regulations pursuant to LAMC §12.24F to allow the new facility to be within the required side yard. Development of the Aquatic Center at this location would be subject to future negotiations with SMMC, and would also necessitate modification of building ordinances to allow the outdoor Aquatic Center to cross property lines.

In summary, with approval of the requested actions, the project would be in compliance with LAMC requirements.

Mulholland Scenic Parkway Specific Plan

The Specific Plan includes regulations for development and use of properties within the Outer Corridor; these regulations apply to project sites, such as the Buckley campus, when all or a portion of the lot to be developed is located within the Outer Corridor. The regulations pertain to land use, environmental protection measures, grading, and allowable building heights. With regard to use, the project requests a Specific Plan Exception for relief from the Mulholland

[134] *The Disney Pavilion is 38 feet in height. Given the sloping nature of the campus, the rooflines of all proposed buildings within the Main Academic Campus would fall below that of the Disney Pavilion, including those buildings with greater building heights which would be located at lower elevations. Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights. Refer to Figure IV.4-7 in Section IV.A, Aesthetics, for an illustration of the proposed building elevations.*

Scenic Parkway Specific Plan requirements in order to allow the continued educational/ institutional use and new associated facilities subject to the Specific Plan. As indicated above, The Buckley School has been at its current location since the late 1960s, prior to the adoption of the Specific Plan. Approval of a Specific Plan Exception would allow the continuation of an existing legal non-conforming private school use. In accordance with LAMC §11.5.7F, the Area Planning Commission has initial decision-making authority for granting exceptions from specific plan regulations, except when initial decision-making authority occurs with the City Planning Commission pursuant to LAMC §12.36 and City Charter §564. With approval of the requested Specific Plan Exception, the proposed uses and School operations would be consistent with the Specific Plan. Such approval requires that the following findings must be made:

- That the strict application of the regulations of the specific plan to the subject property would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of the specific plan;

- That there are exceptional circumstances or conditions applicable to the subject property involved or to the intended use or development of the subject property that do not apply generally to other property in the specific plan area;

- That an exception from the specific plan is necessary for the preservation and enjoyment of a substantial property right or use generally possessed by other property within the specific plan area in the same zone and vicinity but which, because of special circumstances and practical difficulties or unnecessary hardships is denied to the property in question;

- That the granting of an exception will not be detrimental to the public welfare or injurious to the property or improvements adjacent to or in the vicinity of the subject property; and

- That the granting of an exception will be consistent with the principles, intent and goals of the specific plan and any applicable element of the general plan.

With regard to environmental protection measures, the Outer Corridor regulations defer to those for the Inner Corridor. Such environmental protection measures address prominent ridges, streams, projects located near parklands, oak trees, and archaeological and paleontological resources, as indicated and analyzed in Table IV.H-2 on page 284. As discussed above, pursuant to MSPSP Sections 6B and 5B, the project would require that Environmental Findings be made since the project would be located within 100 feet of streams as defined by the MSPSP, grading is proposed within 200 feet of parklands as defined by the MSPSP, and oak trees would be removed. The analysis provided in Table IV.H-2 illustrates that such findings can be made.

Table IV.H-2

Project Consistency With Environmental Protection Measures in the Mulholland Scenic Parkway Specific Plan

Environmental Protection Measure (Relevant Excerpts)	Consistency with Measure
1. Prominent Ridges	
Grading on Prominent Ridges. Prominent ridges shall not be graded, altered or removed without the prior written approval of the Director [of City Planning]. The Director may approve up to 1,000 cubic yards of grading of a prominent ridge after making [specified findings]. Construction. Buildings and structures visible from Mulholland Drive shall not be constructed on top of a prominent ridge. Buildings and structures visible from Mulholland Drive shall not be constructed within 50 vertical feet of the top of a prominent ridge without the prior written approval of the Director. The Director may approve construction of a building and/or structure within 50 vertical feet of the top of a prominent ridge, but not exceeding the top after making [specified findings].	As shown in Figure IV.H-4, the project site does not include a prominent ridge as identified by the Specific Plan. Thus, implementation of the project would not grade or construct buildings on a prominent ridge.
2. Streams	
No project shall be constructed and no more than 100 cubic yards of earth shall be moved within 100 feet of either stream bank without the prior written approval of the Director. In granting an approval, the Director shall make the following findings: a. The applicant has employed a biologist to prepare a report which contains the following: the location(s) of the stream's banks, an assessment of the riparian resources, an evaluation of the project's impact on the riparian resources and a recommendation of feasible mitigation measures. b. The applicant has submitted to the Director for his approval a copy of the biologist's report and a covenant and agreement which runs with the land and which states that the mitigation measures recommended by the biologist and approved by the Director will be incorporated in the project and maintained. The covenant and agreement shall be recorded by the applicant. c. The project preserves the natural vegetation and the existing ecological	As described in Section IV.C, Biological Resources, the project would not result in impacts associated with "Waters of the U.S.," "Waters of the State," wetlands, or wetland habitats. More specifically, as discussed in the biological resources analysis, non-wetland waters subject to the U.S. Army Corps of Engineers (ACOE) and California Department of Fish and Game (CDFG) were delineated by PCR biologists, as were the various plant communities on-site. The analysis concluded that the project would not impact jurisdictional waters on or near the site. Potential impacts associated with native trees and migratory birds would result from the project; however, the proposed mitigation measures would reduce such impacts to less than significant levels. No other significant impacts to biological resources would result from project implementation. Furthermore, as discussed in Section IV.A, Aesthetics, Section IV.E, Geology, and in the analysis above, the project would preserve and enhance the natural character of the campus's canyon setting, would not affect a prominent ridge, nor would it substantially alter geologic or topographic features on-site. Based on the analyses within

Table IV.H-2 (Continued)

Project Consistency With Environmental Protection Measures in the Mulholland Scenic Parkway Specific Plan

Environmental Protection Measure (Relevant Excerpts)	Consistency with Measure
balance. d. The project protects prominent ridges, streams, environmentally sensitive areas and the aquatic, biologic, geologic and topographic features therein. e. The project will not damage the integrity of a stream.	this EIR, the required findings can be made for construction and grading within 100 feet of a stream bank.
3. Proximity to Parklands	
No project shall be erected and no earth shall be graded within 200 feet of the boundaries of any public parkland without the prior written approval of the Director pursuant to Section 11 [of the Specific Plan]. The Director may approve construction of a project or grading within 200 feet of public parkland after making the following findings: f. The project preserves the residential character along the right-of-way. g. The project will minimize erosion. h. The project preserves the natural vegetation and the existing ecological balance. i. The project protects identified archaeological and paleontological sites. j. The project minimizes driveway access into the right-of-way.	Grading associated with the proposed Middle and Upper School Main Academic Center and Parking Facility would occur within 200 feet of Fossil Ridge Park. In accordance with the Specific Plan provisions, such grading and the new facilities would require approval upon making the specified findings. Given the distance of the site from Mulholland Drive, the project would not have any effects on the street right-of-way. As analyzed in detail in Section IV.A, Aesthetics, of this EIR, the project would enhance the visual character of the campus and be aesthetically compatible with the surrounding residential setting. As discussed in Sections IV.E, Geology and IV.G, Hydrology, best management practices (BMPs), which would reduce and/or eliminate erosion potential, would be utilized as part of project development. In addition, project development would be concentrated within existing developed, paved or otherwise disturbed areas of the site in order to minimize impacts upon the canyon slopes and associated vegetation. As addressed in Section IV.C, Biological Resources, a limited amount of native vegetation exists within the portions of the project site to be affected, and impacts to biological resources would be less than significant. Finally, as discussed in Section IV.D, Cultural Resources, implementation of mitigation measures would reduce potential impacts to paleontological resources to a less than significant level. Based on the analyses within this EIR, the required findings can be made for project grading within 200 feet of public parkland.

Table IV.H-2 (Continued)

Project Consistency With Environmental Protection Measures in the Mulholland Scenic Parkway Specific Plan

Environmental Protection Measure (Relevant Excerpts)	Consistency with Measure
4. Oak Trees	
No oak tree (*quercus agrifolia, lobata, q. virginiana*) shall be removed, cut down or moved without the prior written approval of the Director. The Director may approve the removal, cutting down or moving of an oak tree after making the following findings: a. The removal, cutting down or moving of an oak tree will not result in an undesirable, irreversible soil erosion through diversion or increased flow of surface waters. b. The oak tree is not located with reference to other trees or monuments in such a way as to acquire a distinctive significance at said location.	As discussed in Section IV.C, Biological Resources, the project would result in the removal of eight oak trees, which would be replaced on at least a two to one basis on-site in accordance with LAMC requirements. Section IV.A, Aesthetics, of this EIR, addresses visual impacts, and Sections IV.E, Geology and IV.G, Hydrology, analyze erosion impacts, all of which would be less than significant. The oak trees to be removed as part of the project would not result in irreversible erosion or the loss of a visual resource that is visually significant, and as such, the necessary findings can be made for oak tree removal.
5. Archaeological and Paleontological Resources	
Applicants which propose to grade more than 50 cubic yards per 5,000 square feet of lot area shall submit to the Director a preliminary archaeological and paleontological record search from the State Regional Archaeological Information Center (UCLA). If this search reveals that archaeological and paleontological resources may be located on the lot, the applicant shall file an environmental assessment with the Planning Department.	Official archeological and paleontological records searches have been conducted for the project. Specifically, based on the records search conducted by the South Central Coast Information Center at California State University, Fullerton, and as discussed in the Initial Study presented in Appendix B, impacts associated with archeological resources would be less than significant. In addition, as discussed in Section IV.D, Cultural Resources, which incorporates a records search by the Natural History Museum of Los Angeles County, paleontological resources may be encountered as a result of project construction. As discussed therein, with incorporation of appropriate mitigation measures, potential impacts to such resources would be less than significant.

The Outer Corridor regulations regarding grading state that no grading in excess of two cubic yards (cy) of earth per four square feet of lot area for lots visible from Mulholland Drive shall be permitted without the approval of the Director. Grading activities for the project would require an estimated 15,674 cy of cut and 15,674 cy of fill, with nominal (i.e., less than 1,000 cy) soil import and export. As the campus comprises approximately 803,246 square feet, based on the specified formula, approximately 401,623 cy of grading is permitted on-site. As such, the grading required for the project would be well below the permitted amount, and the project would be consistent with this regulation.

With regard to building heights, the Outer Corridor regulations (Section 6D) state that the height of any building or structure visible from Mulholland Drive shall not exceed 40 feet. As part of the project, a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F would be required to allow one building to exceed this height limit. As discussed above, the high point of the new Middle and Upper School Main Academic Center and Parking Facility would measure up to 55 feet in height from existing grade. However, it would visually appear no greater than 43.6 feet in height from most vantages due to the sloping nature of the site's topography and grade changes proposed as part of the project. This maximum building height and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. In any case, no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[135] Furthermore, given the distance of the site from Mulholland Drive and location of proposed buildings within areas that are already generally developed, views from the Scenic Parkway would not be substantially affected by the increased building height. All other proposed building heights would fall below the 40-foot height limit specified by the Specific Plan. With the approval of a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F, the project would be consistent with applicable height regulations of the Specific Plan. Refer to Section IV.A, Aesthetics, for further discussion regarding height limits.

As part of the project, approval of a Parcel Map would be sought pursuant to LAMC §17.53 to create two legal lots at the campus, one primarily encompassing those portions of the campus beyond the boundary of the Outer Corridor (Parcel 1, approximately 10.6 acres in size), and the other primarily encompassing those portions of the campus within the Outer Corridor, plus additional area to create a legal lot (Parcel 2, approximately 7.7 acres in size). This action would not affect project development relative to the Specific Plan approvals currently sought, but would guide any future development at the campus.

[135] *Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

Project development would also be guided by the Specific Plan Design and Preservation Guidelines. As stated above, the Guidelines are not intended to be mandatory requirements for projects. Rather, it is expected that, at a minimum, individual projects address the applicable Guidelines. Consistent with Guidelines 1 and 10, construction of new buildings would occur in previously developed or paved areas, thereby minimizing grading impacts as well as the use of retaining walls for the project. However, some grading activities would take place adjacent to the slopes that line the canyon. Grading for the project would involve an estimated 15,674 cy of cut and approximately 15,674 cy of fill, with nominal (i.e., less than 1,000 cy) soil import and export. All grading activities would comply with applicable City of Los Angeles grading requirements. In addition, the project would be consistent with the Guidelines 5 and 33 regarding site design/layout. The project's non-permeable surface area would not substantially exceed 50 percent.[136] The project would provide considerable pervious areas (i.e., athletic fields, play areas, and landscaping) and would implement BMPs to minimize runoff. Water quality impacts are further discussed in Section IV.G, Hydrology, of this EIR. In addition, the project would have a low building footprint to total lot area ratio of 0.21:1. Finally, the project would be consistent with Guideline 16 regarding protection of public parkland. As noted above, project construction would occur in areas that have previously been developed or paved. The adjacent Fossil Ridge Park would be preserved. As further discussed below, the project would be consistent with Guideline 50 regarding compatibility with existing neighborhoods. Additional guidelines regarding aesthetics and views apply to the project. Please refer to Section IV.A, Aesthetics, for a more detailed analysis of consistency with these guidelines.

In summary, with approval of Exceptions to the Specific Plan with regard to the continued use of the site for educational purposes and exceedance of the maximum 40-foot building height limit, the project would be consistent with the Specific Plan. Overall, the project would also comply with the intent of the Design and Preservation Guidelines, which seek to protect views along the Mulholland Scenic Parkway Corridor in accordance with the Specific Plan.

(2) Consistency with Regional Plans and Applicable Policies

SCAG Regional Comprehensive Plan and Guide

Adopted polices within SCAG's RCPG that are related to land use are generally contained within Chapter 3, Growth Management. As indicated above, the project does not meet the criteria of §15206 with regard to its size; nonetheless a brief analysis is provided herein.

[136] *The School is evaluating the feasibility of introducing artificial turf within the athletic field area. Artificial turf is not considered entirely permeable, thus if introduced, the site would be composed of an estimated 50.6 percent of impervious surfaces.*

SCAG policies that apply to the project include: encouraging patterns of land use development that reduce infrastructure costs and make better use of existing facilities; encouraging projects that reduce the need for roadway expansion and reduce the number of auto trips and vehicle miles traveled; encouraging projects that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment; encouraging development in activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment; and supporting development in locations least likely to cause adverse environmental impact. The Growth Management chapter also provides growth projections, which are utilized in other chapters within the RCPG, specifically the Regional Mobility and Air Quality chapters.

The project would support the concepts and policies contained within the RCPG as expansion of the existing school facilities would concentrate development within a previously developed site located near existing public facilities, infrastructure, and roadways. In order to minimize environmental impacts, new development would generally occur in those areas of the site that have previously been graded and developed, thereby protecting the natural character of adjacent hillsides. Project implementation would also facilitate traffic circulation with development of a new enclosed Parking Facility and an associated on-site vehicle queuing area. Also in support of RCPG policies, the project's design features (e.g., the concentration of new construction on the eastern side of the site, furthest from adjacent residences; the use of grading materials as fill material so as to nearly eliminate the need for soil export; introduction of a Central Plant within the eastern portion of the site to maximize utility efficiency), combined with the existing site conditions and proposed mitigation measures, would serve to minimize adverse environmental impacts to the extent feasible. The limited growth in the student population and employment levels would also fall well within RCPG growth projections for the area. In summary, the proposed project would not result in any significant impacts associated with consistency with SCAG's RCPG.

SCAQMD Air Quality Management Plan and MTA Congestion Management Plan

As discussed in Section IV.B, Air Quality, project implementation would not interfere with the attainment of air quality standards, nor would it conflict with the AQMP for the South Coast Air Basin. Furthermore, since the AQMP incorporates projections from local planning documents and the proposed project would be consistent with the existing land use designations of the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan, the project would not conflict with the AQMP. In addition, as discussed in Section IV.J, Transportation and Circulation, of this EIR, implementation of the project would not conflict with the CMP as it would not exceed CMP thresholds at any CMP intersection or freeway monitoring location.

Conclusion Regarding Impacts on Regulatory Framework

Based on the above analysis and with approval of the requested Conditional Use Permit, Specific Plan Exceptions, Modification of height regulations, Site Plan Review findings, and potential yard setback modification, implementation of the proposed project would be generally consistent with applicable land use polices and the land use designations and zoning for the project site. Therefore, significant impacts associated with the project's consistency with applicable land use plans would not occur, and no mitigation measures would be required.

(3) Land Use Compatibility

As discussed previously, the existing Buckley School campus has been developed for use as a private school since the late 1960s. Educational uses have therefore been part of the land use relationships within the local residential area for over a two generations. Schools are often sited in residential neighborhoods because their purpose is to educate a subset of the residential population. Public school properties are, for the most part, located throughout the City of Los Angeles in residential neighborhoods, though most public school sites are zoned "Public Facility" due to public ownership. Private schools, on the other hand, are typically permitted as a conditional use subject to issuance of a CUP in which conditions are specified to ensure compatibility with nearby residential uses. Therefore, schools are a necessary and appropriate use in residential areas. Project consistency with the site's existing and proposed land use and zoning designations, discussed above, further supports the suitability of proposed development at the project site.

Numerous schools throughout the City have been developed, renovated and enlarged in the midst or on the edge of residential neighborhoods. A limited sampling of the many private elementary, middle and high schools located in or adjacent to residential areas includes: Notre Dame High School in Sherman Oaks; The Archer School for Girls, Berkeley Hall, Brentwood School, Curtis School, Milken High School, Mirman School, St. Martin of Tours, and Westland School, all in Brentwood; John Thomas Dye, Marymount High School, Harvard-Westlake Middle School, and Stephen S. Wise Temple Elementary School, all in Bel Air; Campbell Hall Episcopal, and Harvard-Westlake Upper School, both in Studio City; The Wesley School and Oakwood Elementary and Secondary Schools in North Hollywood; and Crespi Carmelite High School and Our Lady of Grace in Encino. Numerous other private schools are located in other residential communities throughout the City. Many of these schools have recently modernized and/or expanded at their existing locations, and such improvements are consistent with the City's well-established policy of siting and maintaining schools in residential areas. Similarly, the proposed campus enhancements would support a well-established City policy that the improvement of existing school facilities, when properly conditioned through the discretionary review process, is preferred over the construction of entirely new school facilities within established residential areas.

The project represents a continuation of an existing private school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. As discussed in Section II, Project Description, the project has been specifically designed to achieve the following objectives: to respect the residential character of the neighborhood; to nearly balance cut and fill quantities on-site in order to limit the export and import of soil and avoid associated impacts; to concentrate construction within the center of the campus in an effort to buffer adjacent residential neighbors from construction activities and school operations; to create a visually unified campus and harmonize structures and landscaping with the natural landforms that surround the campus; to design structures to be compatible with existing buildings by limiting the rooflines of new buildings within the Main Academic Campus to be even with or below the roofline of the existing Disney Pavilion; and to reduce hardscape and roadways in favor of a greener campus featuring native plant species appropriate for the canyon setting. Relative to vehicular circulation, which can be a source of land use incompatibility, the project has been designed to contain vehicle queuing for student drop-off/pick-up within the campus in order to keep this activity off of Stansbury Avenue, and to provide on-campus parking that is adequate to accommodate the vehicles of parents and visitors to the campus. The project also includes a TDM plan to minimize additional vehicle trips to the site (discussed in Section IV.J, Transportation and Circulation). Furthermore, the project would allow the School to revise operating conditions that are confusing or stimulate difficulties with the neighbors to incorporate current City standards for private schools within the City.

Development of the project within the existing campus would not physically disrupt or divide existing land uses in the area, encroach upon residential uses, or alter the overall character of the campus or the surrounding neighborhood. While the project would allow for an increase in floor area, a modest increase in the number of students, and new outdoor athletic facilities (e.g., the proposed Aquatic Center and new basketball court), as demonstrated throughout the analyses within this EIR, none of the operational characteristics of the project would result in a significant environmental impact. The additional educational space would allow The Buckley School to better serve its existing student population and accommodate a modest increase in enrollment without substantial expansion of the campus from its existing building footprint. New development would occur primarily within existing disturbed and paved areas in order to limit grading and excavation. The proposed student increase would enhance the School's curriculum flexibility and maximize operational efficiencies. The total increase of 80 students represents a modest 10.7 percent increase above the current permitted enrollment of 750 students. Additionally, The Buckley School would continue to have a smaller student enrollment than other comparable 13-grade private schools in the City (e.g.,. Campbell Hall Episcopal, Chadwick School, and St. Monica Elementary & High School). Furthermore, the post-project statistic of total square feet of building area per student would be less for the project (approximately 203 square feet/student) than the average of other private schools in the City (223 square feet/student).[137] Relative to the proposed building heights, as previously discussed, the new maximum building height of up to 55 feet for the Middle and Upper School Main Academic Center and the proposed changes in finished grade would be necessary to accommodate the project's excavated soils on-site in order to nearly eliminate the need for soil export or import. Regardless, most buildings would be or appear less than 36 feet in height, and no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion.[138] In addition, since new development would generally occur in those areas of the site that have previously been graded and developed, the natural character of the site would be protected and views from nearby residential areas would not be substantially affected. Despite an increase in the intensity of development on-site, the overall massing and scale of the site would be similar to existing conditions due to project sensitivity relative to building siting, building heights that are generally consistent with existing building heights, and the use of an enclosed parking facility. Please refer to Sections IV.A, Aesthetics; IV.B, Air Quality; and IV.I, Noise, for further discussion of design, air quality, and noise compatibility issues.

Construction activities can also be a source of compatibility problems. Construction of the project would result in temporary significant impacts associated with noise and localized air emissions. However, these impacts would be short-term in nature and would be phased to avoid disruption of classes during the regular school year and to minimize impacts on neighbors of the campus at all times. Based on the above, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

3. MITIGATION MEASURES

The project's design features, which are described above and would become conditions of approval, would ensure that land use impacts associated with the proposed project would be less than significant. Thus, no mitigation measures would be required.

4. CUMULATIVE IMPACTS

As indicated in Section III, Environmental Setting, of this EIR, there are 29 related projects in the project vicinity. The related projects generally consist of infill development and

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[137] *Based on an analysis of 13 independent schools throughout the City.*

[138] *Due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

redevelopment of existing uses. As with the proposed project, related projects would be required to comply with relevant land use policies and regulations. Therefore, as the project would generally be consistent with applicable land use plans, the project would not incrementally contribute to cumulative inconsistencies with respect to land use plans. Cumulative impacts on the regulatory framework would be less than significant.

Additionally, there are no related projects located within the immediate vicinity of the site. Therefore, the project in combination with related projects would not alter the existing land use relationships in the community. As such, the project would not contribute to a cumulative impact with respect to land use compatibility.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to land use would be less than significant, and therefore, no mitigation measures would be required.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. NOISE

The following analysis defines the existing noise environment within the project area and estimates future noise levels at surrounding land uses resulting from construction and operation of the proposed project. This analysis is based on technical documentation prepared by Arup Acoustics and PCR Services Corporation included in Appendix J and K, respectively, to this EIR.

1. ENVIRONMENTAL SETTING

a. Noise and Vibration Basics

(1) Noise

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as "noisiness" or "loudness." Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB).

The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted filter system is used to adjust measured sound levels. The A-weighted sound level is expressed in "dBA" or "dB(A)." Typical A-weighted sound levels measured for various sources, as well as people's responses to these levels, are provided in Figure IV.I-1 on page 295.

Objects that obstruct the line-of-sight between a noise source and a receptor attenuate the source strength if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., the line-of-sight is not fully blocked), some barrier insertion loss would still occur, however to a much lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receptor, thereby compounding the noise.

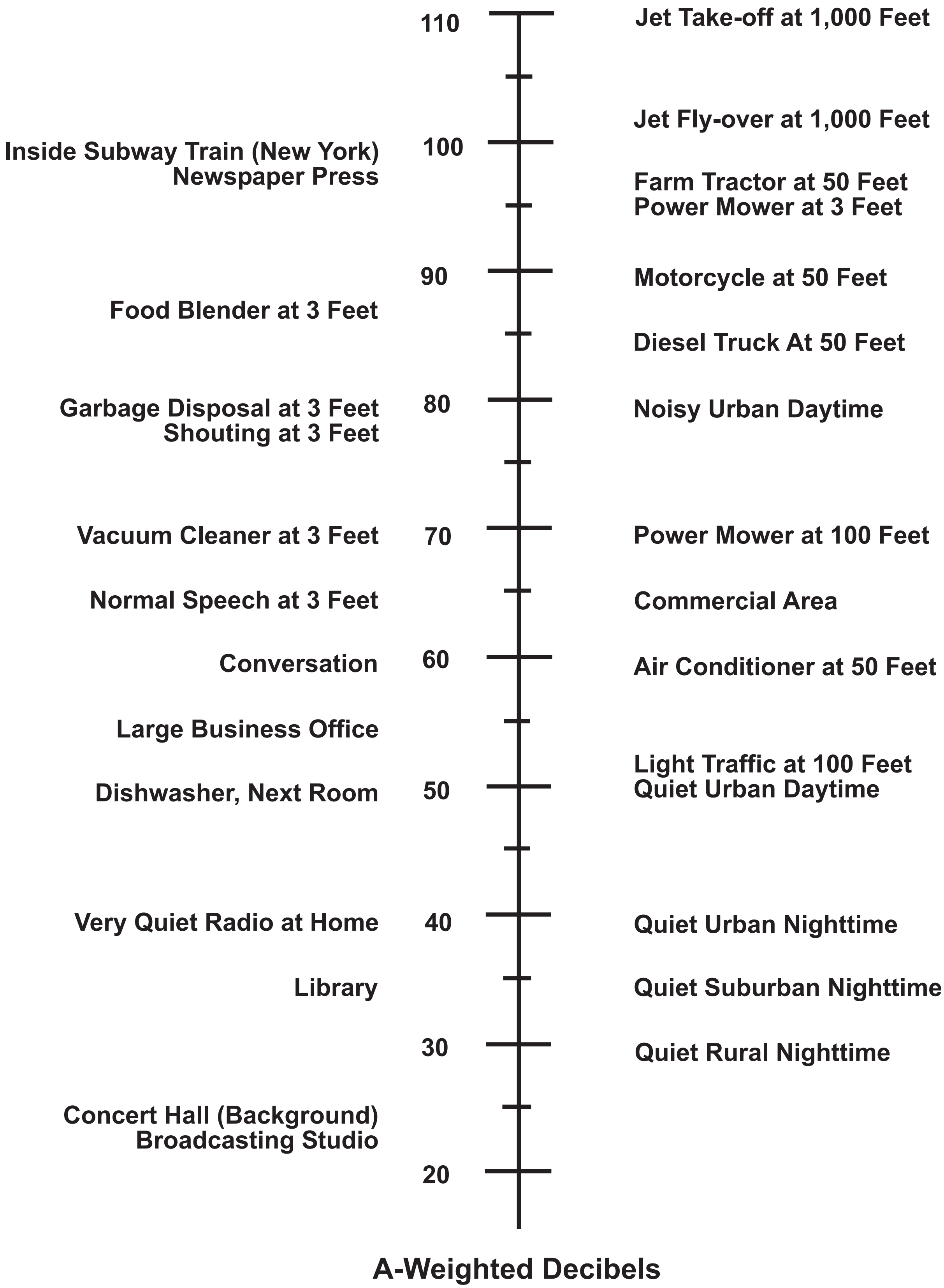

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Figure IV. I-1
A-Weighted Sound Levels

Source: Compiled by Hodges & Shutt from Various Sources (December 1993)

Time variation in noise exposure is typically expressed in terms of the average energy over time (L_{eq}), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Thus, half the time the noise level exceeds this level and half the time the noise level is less than this level. This level is also representative of the level that is exceeded 30 minutes in an hour. Similarly, the L_{08} and L_{25} represent the noise levels that are exceeded 8 and 25 percent of the time, respectively, or for 5 and 15 minutes during a one-hour period, respectively. These "L" values are used to evaluate compliance for stationary noise sources with the City of Los Angeles Noise Ordinance, as discussed below.

Other values typically noted during a noise survey are the L_{min} and L_{max}. These values represent the minimum and maximum noise levels observed during a measurement period, respectively. Maximum and minimum noise levels, as compared to the L_{eq}, are a function of the characteristics of the noise source. As an example, sources such as compressors, generators, and transformers have maximum and minimum noise levels that are similar to L_{eq} since noise levels for steady-state noise sources do not substantially fluctuate. However, as another example, vehicular noise levels along local roadways result in substantially different minimum and maximum noise levels when compared to the L_{eq} since noise levels fluctuate during pass by events.

Although the A-weighted scale accounts for the range of people's response, and therefore, is commonly used to quantify individual event or general community sound levels, the degree of annoyance or other response effects also depends on several other perceptibility factors. These factors include:

- Ambient (background) sound level;
- Magnitude of sound event with respect to the background noise level;
- Duration of the sound event;
- Number of event occurrences and their repetitiveness; and
- Time of day that the event occurs.

Several methods have been devised to relate noise exposure over time to community response. A commonly used noise metric for this type of study is the Community Noise Equivalent Level (CNEL). The CNEL, originally developed for use in the California Airport Noise Regulation, adds a 5 dBA penalty to noise occurring during evening hours from 7:00 P.M. to 10:00 P.M., and a 10 dBA penalty to sounds occurring between the hours of 10:00 P.M. to 7:00 A.M. to account for the increased sensitivity to noise events that occur during the quiet late evening and nighttime periods. Thus, the CNEL noise metric provides a 24-hour average of A-weighted noise levels at a particular location, with an evening and a nighttime adjustment, which reflects increased sensitivity to noise during these times of the day.

(2) Ground-Borne Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration velocity is most often described in terms of peak particle velocity (PPV) for purposes of ground-borne vibration analysis. Typically, ground-borne vibrations generated by man-made activities attenuate rapidly with distance from the source of the vibration. Man-made vibration issues are therefore usually confined to short distances (i.e., 500 feet or less) from the source.

Both construction and operation of development projects can generate ground-borne vibration. In general, demolition of structures during construction generates the highest vibrations. Construction equipment such as vibratory compactors or rollers, pile drivers, and pavement breakers can generate perceptible vibration during construction activities. Heavy trucks can also generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions.

b. Regulatory Framework

Many government agencies have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise and ground-borne vibration. The City of Los Angeles has adopted a number of policies and regulations, which are in part based on federal and State regulations that are directed at controlling or mitigating environmental noise effects. City policies and regulations that are relevant to project development and operation are discussed below.

(1) City of Los Angeles Standards and Guidelines

The Los Angeles Municipal Code (LAMC) (Chapter XI, Articles 1 through 6) establishes regulations regarding allowable increases in noise levels in terms of established noise criteria. Supplementing these LAMC regulations, the City has also established CNEL guidelines that are used for land use planning purposes.

(a) City of Los Angeles Noise Regulation

The City of Los Angeles Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment, vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation limits for residential zones, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. In cases where the actual measured ambient level is not known or is less than 50 dBA, the presumed daytime (7:00 A.M. to 10:00 P.M.) minimum ambient noise for properties zoned residential is 50 dBA, while the nighttime (10:00 P.M. to 7:00 A.M.) ambient is 40 dBA.[148] For purposes of determining whether or not a violation of the Noise Regulation is occurring, the sound level measurements of an offending noise that has a duration of five minutes or less during a one hour period is reduced by 5 dBA to account for people's increased tolerance for short-duration noise events.

The City of Los Angeles Noise Regulation also limits noise from construction equipment within 500 feet of a residential zone to 75 dBA, measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.[149] The Noise Regulation prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and does not allow construction noise on Sunday. The LAMC does not set a maximum noise level for person generated noise such as yelling or cheering in a park. However, the Noise Control Ordinance of the County of Los Angeles (County Noise Ordinance) does set such limits. Specifically, Section 12.08.390 of the County Noise Ordinance sets a maximum noise level from any noise source in a residential zone at 70 dBA, when measured at the property line. However, if existing ambient noise levels exceed 70 dBA, the limit is adjusted to reflect the measured ambient maximum noise level.[150]

(b) City of Los Angeles CNEL Guidelines

The City of Los Angeles has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide" in terms of the CNEL. CNEL guidelines for specific land uses are classified into four categories:

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[148] *LAMC, Section 111.03.*

[149] *In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations cannot be complied with at a project site, despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.*

[150] *The City of Los Angeles does not have L_{max} limits. Therefore, information regarding the County L_{max} limit is provided to establish a framework for the discussion of athletic activities.*

(1) "normally acceptable," (2) "conditionally acceptable," (3) "normally unacceptable," and (4) "clearly unacceptable." As shown in Table IV.I-1 on page 300, a CNEL value of 60 dBA is the upper limit of what is considered a "normally acceptable" noise environment for single-family residential uses, although a CNEL as high as 70 dBA is considered "conditionally acceptable." For less sensitive office and industrial uses, the upper limit of what is considered "normally acceptable" is set at 70 and 75 dBA CNEL, respectively.[151]

(2) Ground-Borne Vibration Guidelines

There are no adopted City of Los Angeles policies or standards for ground-borne vibration. The traditional view has been that common vibrations related to roadway traffic and construction activities pose no threat to buildings or structures. However, Caltrans does recommend that extreme care be taken when sustained pile driving occurs within 7.5 meters (25 feet) of any building, and 15 to 30 meters (50 to 100 feet) of a historic building or any building in poor condition. In addition, the Federal Transit Authority has established a PPV threshold of 0.2 inch per second for vibration in proximity to fragile buildings.

c. Existing Local Noise Conditions

(1) Noise-Sensitive Receptors

Some land uses are considered more sensitive to intrusive noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. Residences, schools, motels and hotels, libraries, religious institutions, hospitals and nursing homes are generally more sensitive to noise than commercial and industrial land uses. Noise-sensitive land uses (sensitive receptors) in the project vicinity consist of single-family residences that are located immediately north and west of the project site.

(2) Ambient Noise Levels

Noise sources within the vicinity of the project site include vehicular traffic along local streets, as well as outdoor activity on the project site (e.g., student use of the athletic field and court areas). Other community noise sources include landscaping maintenance activities at local residences as well as on the project site. To ascertain existing conditions, 24-hour ambient sound measurements were conducted at five nearby sensitive receptor locations. Measurement locations are shown in Figure IV.I-2 on page 301. As indicated in Table IV.I-2 on page 302, the

[151] *L.A. CEQA Thresholds Guide, Section I.2, 1998.*

Table IV.I-1

City Of Los Angeles Land Use Compatibility For Community Noise

Land Use	Community Noise Exposure CNEL, dBA Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70
Multi-Family Homes	50 to 65	60 to 70	70 to 75	Above 70
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Transient Lodging—Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

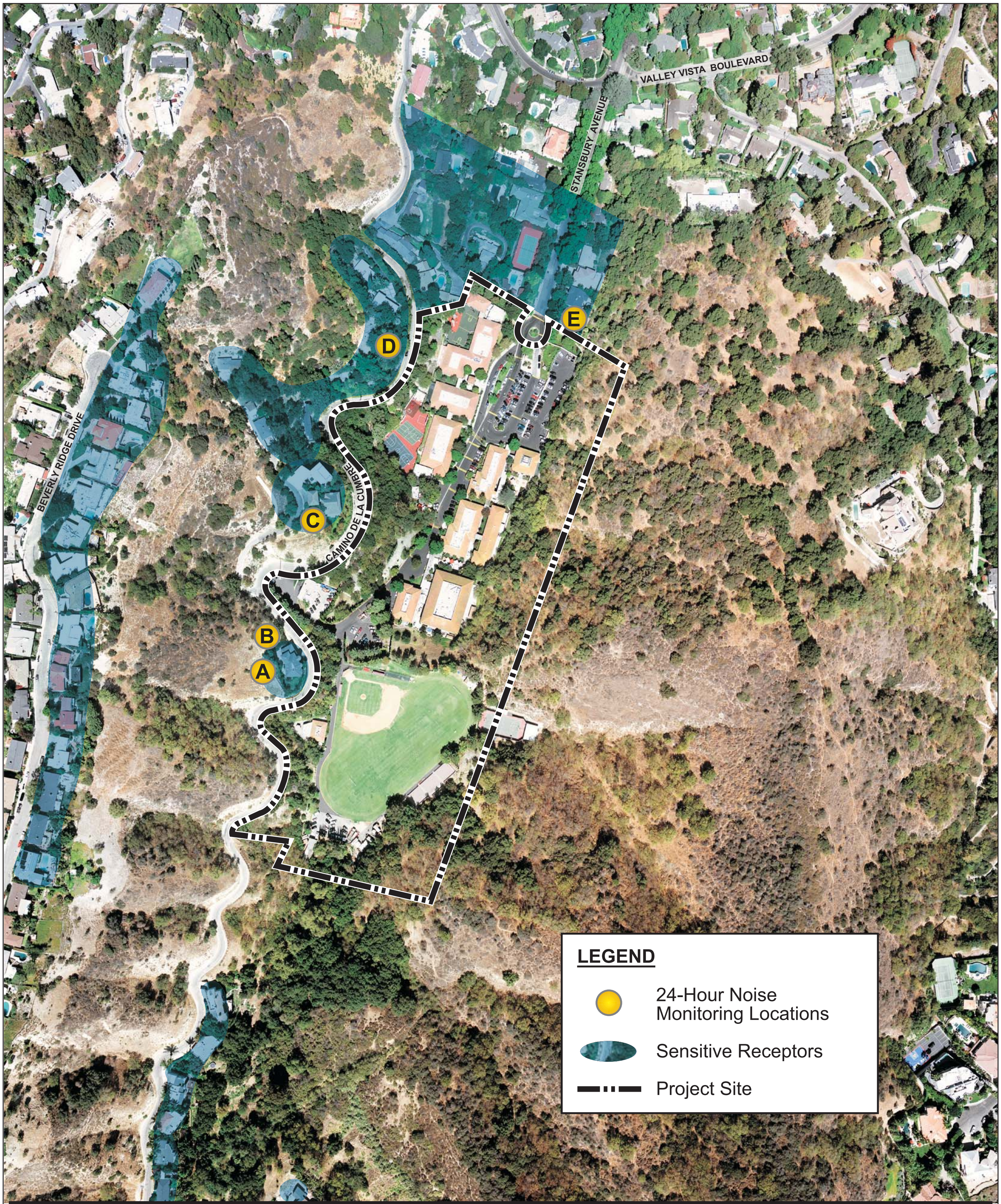
Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: L.A. CEQA Thresholds Guide, adopted August 2001.

L_{eq} during the hours of 7:00 A.M. to 5:00 P.M. ranged from 41 dBA to 60 dBA and the CNEL at these measurement locations ranged from 47.7 CNEL to 59.0 CNEL.

Based on field observation and a review of the measured sound data, the existing noise environment in the vicinity of the project site is largely influenced by traffic on local streets.



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Scale not Provided

Figure IV. I-2
24-Hour Noise Measurement and Sensitive Receptor Locations

Source: PCR Services Corporation, 2006

Table IV.I-2

Measured Ambient Noise Levels

	Measured Ambient Noise Level at Receptor Locations	
Measurement Location	**dBA L_{eq} (Hourly) (7:00 A.M.–5:00 P.M.)**	**dBA CNEL**
A	48	53.8
B	41	47.7
C	57	57.5
D	55	55.5
E	60	59.0

Source: PCR Services Corporation, 2006.

Higher noise levels are experienced during the daytime hours when traffic volumes are higher, and lower noise levels are experienced during nighttime hours when traffic volumes are lower. To a lesser extent, the noise environment is affected by school activities and lawn maintenance activities at nearby residential properties.

(3) Roadway Noise Levels

The CNEL generated by existing traffic on local roadways within the project vicinity was established using a version of the Federal Highway Administration (FHWA) Traffic Noise Prediction methodology (FHWA-RD-77-108) and traffic data provided by the project traffic consultant. As indicated in Table IV.I-3 on page 303, the calculated CNEL for the analyzed roadway segments resulting from existing traffic ranged from 55.8 dBA to 62.6 dBA, which is about 4 to 8 dBA higher than the measured CNEL values provided earlier in Table IV.I-2. This condition exists because the noise measurement locations are generally shielded from roadway noise, the project area's predominant noise source, by single-family residential structures. In general, all residences located within the general project vicinity are currently exposed to community noise levels from traffic volumes that are "normally acceptable" and/or "conditionally acceptable," as categorized by the City of Los Angeles' Land Use Compatibility Matrix for Community Noise (refer to Table IV.I-1 on page 300).

(4) Athletic Field Activity Noise

Noise levels used to characterize athletic field activity are based on actual source noise measurements from similar projects and also from measurements conducted at The Buckley School. Typical noise levels for various athletic activities (e.g., football, swimming, softball, and basketball) held at Buckley School are shown in Table IV.I-4 on page 304. The measurement locations at The Buckley School are shown above in Figure IV.I-2.

Table IV.I-3

Calculated Existing Vehicular Traffic Noise Levels

Residential Roadway Segment	Land Use Compatibility Category at Right-of-Way	Predicted Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way [a]		
		Adjacent	50 Feet	100 Feet
Stansbury Avenue, north of Valley Vista Blvd.	Conditionally Acceptable	61.3	56.7	54.5
Stansbury Avenue, south of Valley Vista Blvd.	Normally Acceptable	59.7	55.1	52.9
Valley Vista Blvd., east of Stansbury Avenue	Conditionally Acceptable	62.1	57.5	55.3
Valley Vista Blvd., west of Stansbury Avenue	Conditionally Acceptable	62.6	58.0	55.8
Greenleaf Street, west of Stansbury Avenue	Normally Acceptable	58.4	53.7	51.5
Dickens Street, west of Stansbury Avenue	Conditionally Acceptable	61.4	56.8	54.6
Camino de la Cumbre, west of Stansbury Avenue	Normally Acceptable	56.7	52.1	49.9
Camino de la Cumbre, South of Valley Vista Boulevard	Normally Acceptable	55.8	51.2	49.0

[a] *Calculated using a version of the Federal Highway Administration (FHWA) Traffic Noise Prediction Methodology (FHWA-RD-77-108) and traffic data provided by Crain & Associates in the traffic analysis for the project.*

Source: PCR Services Corporation, 2006.

(5) Noise Attenuation Due to Canyon Setting

A site-specific sound attenuation analysis was conducted by Arup Acoustics to ascertain project area sound attenuation characteristics based on: (1) the area's natural topography; (2) the horizontal grade difference between the school campus property and the neighboring homes that are located west of the school campus; and (3) potential sound reflections from the existing natural landscapes and school buildings. A detailed discussion of the methodology for this analysis is provided in Appendix J. The sound attenuation analysis was performed by placing a noise source (100 dBA at a 20 foot reference distance) within the athletic field portion of school campus and simultaneously measuring noise levels at the 20-foot reference distance, and two locations off-campus that would be representative of off-site conditions for residential uses (e.g., foliage, direct line-of-sight, and slope). The sound source placement and sound monitoring locations are identified in Figure IV.I-3 on page 305.

Table IV.I-5 on page 306 provides a summary of actual (measured) versus predicted sound attenuation based on standard sound distance attenuation calculation procedures. As shown in Table IV.I-5, the actual and predicted sound attenuation values were identical at measurement location 1. However, at measurement location 2, the actual sound attenuation was

Table IV.I-4

Athletic Field Noise Levels

Athletic Activity	Reference Distance (ft.)	Athletic Activity Noise	
		Average Noise Level (L_{eq})	Maximum Noise Levels (L_{max})
Flag Football[1]	20	72	90
Swimming[2]	20	75	87
Softball Game [3]	20	72	88
Basketball Game [4]	20	55	78

[1] *Measured noise level at a flag football game from a similar project, source Arup.*
[2] *Measured noise level at a swim meet from a similar project, source Arup.*
[3] *Measured noise level at a softball game at Buckley School, source Arup.*
[4] *Measured noise level at a basketball game/practice at Buckley School, source PCR Services Corporation.*

Source: PCR Services and Arup Acoustics, 2006

greater than the predicted attenuation. The additional noise reduction observed at measurement location 2 (i.e., in addition to attenuation standard distance attenuation alone) is likely the result of barrier insertion attenuation loss provided by trees and heavy foliage.

A sound reflection test was also conducted at the project site by generating an impulse sound level of approximately 95 dBA measured at the existing athletic field area and recording the resulting sound attenuation at the previously identified sound monitoring locations. Measurement location 1 observed a sound reflection that occurred approximately 83 milliseconds after the direct sound, which was approximately 15 dBA lower than the direct sound. Measurement location 2 observed a sound reflection that occurred approximately 130 milliseconds after the direct sound, which was approximately 5 dBA lower than the direct sound.

Overall, the net result of the sound reflection test indicates that residents located near monitoring location A would hear direct sounds, as well as reflective sounds from the same noise source, from any activity that takes place in the athletic field play area. This would increase such noise levels by about 1 dBA near monitoring location A. Residents located near monitoring location 2 would also hear direct sounds, as well as reflective sounds from the same noise source, from any activity that takes place in the athletic field play area. Sound levels that originate from the athletic field play area would be increased by about 2 dBA due to sound reflections at areas near monitoring location 2. A detailed discussion of the sound attenuation and sound reflection tests, and test results, is provided in Appendix J.

Figure IV. I-3
Sound Attenuation Test Locations

Table IV.I-5

Sound Propagation/Attenuation Test Summary

Monitoring Location [a]	Distance from Sound Source (feet)	Measured Sound Attenuation (dBA) [b]	Predicted Sound Attenuation Due to Distance Alone (dBA) [c]	Estimated Attenuation from Trees and Foliage Conditions (dBA)
1	315	24	24	—
2	815	35	32	3

[a] *Monitoring locations are in provided in Figure IV.I-3.*
[b] *This measured sound attenuation was used in calibrating the site-specific noise prediction model.*
[c] *This estimated sound attenuation was based on distance alone (6-dB per doubling of distance) and does not consider intervening structures and topography.*

Source: Arup Acoustics, 2006.

(6) Ground-Borne Vibration

The only source of ground-borne vibration in the project vicinity is vehicular travel (refuse trucks, delivery trucks, and school buses) on local roadways. Existing ground-borne vibration levels within the project vicinity from these sources are negligible.

2. ENVIRONMENTAL IMPACTS

a. Methodology

A summary of the methodology used to evaluate noise and ground-borne vibration impacts that may result from project construction and long-term operations is provided below.

(1) On-Site Construction Noise

Construction noise impacts were evaluated by determining the noise levels generated by construction activity, calculating the construction-related noise level at surrounding residential property locations, and comparing the construction-related noise to ambient noise levels (i.e., noise levels without construction noise) to determine whether such noise levels would result in significant impacts.

(2) Off-Site Roadway Noise (During Construction and Project Operations)

Roadway noise impacts were evaluated using a version of the FHWA Traffic Noise Prediction methodology (FHWA-RD-77-108) and traffic data provided by Crain and Associates, the traffic consultant for the project. Roadway-noise attributable to project development was calculated and compared to baseline noise levels that would occur under the "no project" condition to determine significance.

(3) Outdoor Athletic Activity

Outdoor athletic activity noise impacts were evaluated by determining the noise levels generated by outdoor athletic activities, calculating the hourly L_{eq} and maximum noise level (L_{max}) attributable to athletic activity at surrounding residential property locations, combining these calculated noise levels with monitored ambient noise levels for both existing and proposed athletic field configurations, and then comparing the calculated noise levels to determine significance.

(4) Stationary Point-Source Noise

Stationary point-source noise impacts were evaluated by identifying the noise levels generated by outdoor stationary noise sources such as rooftop mechanical equipment, outdoor student gathering areas, etc., determining the hourly L_{eq} noise level from noise sources at surrounding residential property locations, and comparing such noise levels to monitored existing ambient noise levels to determine significance.

(5) Ground-Borne Vibration

Ground-borne vibration impacts were evaluated by identifying potential vibration sources and the estimated level of vibration associated with such sources, measuring the distance between vibration sources and surrounding structure locations, estimating the level of vibration at the structure locations from the sources of vibration, and comparing that level of vibration to the significance threshold indicated below to determine whether impacts would be significant.

b. Thresholds of Significance

(1) Construction Noise

The following thresholds of significance are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6 P.M. on Saturday, or at anytime on Sunday.

Since the project construction period would have a duration of more than 10 days and would not occur between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6 P.M. on Saturday, or at anytime on Sunday (consistent with provisions of the LAMC), noise during construction would have a significant impact if:

- Project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise-sensitive use, which in the case of the subject project is the property line of any residence.

(2) General Noise from Project Operations

The following thresholds of significance will be applied to the proposed project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a significant impact related to operational noise would result if:

- The project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category; or
- The project causes any 5 dBA or greater noise increase.

(3) Source-Specific Operational Noise (Outdoor Athletic Activity)

As indicated above, the City of Los Angeles' "L.A. CEQA Thresholds Guide" uses CNEL to evaluate potential impacts associated with operation of a project. However, since CNEL characterizes a 24-hour average noise level, a relatively short duration operational noise event such as athletic field activity would have a negligible effect on CNEL, especially since athletic field activities would occur during daytime hours when the evening and nighttime sensitivity weighting penalties are not applicable. Therefore, an analysis using hourly L_{eq} and maximum (L_{max}) noise levels were used to evaluate the impact of discrete noise events from athletic field activities. In the absence of a City of Los Angeles significance threshold specific to athletic field noise impacts, an impact relative to athletic field activities would be considered significant based on the following:

- A comparison of existing and proposed athletic field noise levels combined with monitored ambient noise levels cause the 1-hour L_{eq} noise level to increase by 3 dBA or more at the property line of any residence; or

- Potential L_{max} noise levels under the proposed site configuration exceed the L_{max} noise levels that occur under the existing site configuration by 3 dBA or more at the property line of any residence.

(4) Ground-Borne Vibration

The City of Los Angeles does not have a specific significance threshold to assess vibration impacts. Thus, the FTA ground-borne vibration standard is used to evaluate potential impacts related to project construction and operation. Therefore, impacts relative to ground-borne vibration would be considered significant if the following future event were to occur:

- Project construction or operations activities cause PPV ground-borne vibration levels to exceed 0.2 inch/second at any off-site structure.

c. Project Features

The following project features related to noise are proposed as part of the project and supplement the Project Description presented in Section II of this EIR. These project features have a potential to influence project-related noise characteristics, and therefore were taken into account during impact evaluation.

Construction:

- A construction relations officer shall be designated by the School prior to commencement of construction to serve as liaison with the adjacent residential community.

- A construction schedule shall be provided to the adjacent residential community prior to commencement of construction.

Stationary Sources:

- No permanent outdoor public address or paging system shall be installed and used on-site except for a system that creates minimal disturbance to adjoining or adjacent residences and used only for "change of class" tones and emergency announcements such as emergency/fire alarms, as required by law. A temporary outdoor audio system may be used for up to four events per year, such as the Buckley Annual Fair, the Fifth Grade Celebration (Fifth grade matriculation to Sixth Grade), and Upper School Commencement. Any radio or audio system used for educational purposes also shall be modulated as to create no disturbance to adjoining or adjacent residences. The indoor public address system and end-of-class buzzer would continue to be used within the campus buildings, as under existing conditions.

- A treatment on the floors of the proposed enclosed parking facility shall be included to minimize tire squeal.

- In excess of Los Angeles Municipal Code (Chapter XI) requirements, HVAC units and all other mechanical equipment operations that have potential to introduce audible sounds beyond any property line shall be enclosed or otherwise attenuated such that equipment-generated noise levels do not exceed 50 dBA at any property line. For any mechanical equipment items required to operate between the hours of 10 P.M. and 7 A.M., such equipment items shall be designed such that equipment generated noise levels do not exceed 40 dBA at any property line.

d. Analysis of Project Impacts

(1) Construction Noise

As discussed in Section II, Project Description of this EIR, the project would include the demolition of six buildings, the construction of five new/replacement buildings, additions to and renovation of two existing buildings and the construction of a new enclosed parking facility and student pick-up/drop-off area to accommodate sufficient parking and queuing lanes for vehicles on campus. Construction of the project would be completed in three general phases, which would occur over the course of three and a half years spread out over an approximately six-year timeframe. Phase 1 would require two months of preparatory work beginning in March 2009, then approximately 12 months beginning in May 2009. Phase 2 would require two months of preparatory work beginning in March 2011, then approximately 18 months beginning in May 2011. However, the possibility exists that Phase 2 might begin as early as 2010, with some preliminary work for Phase 2 overlapping with completion of Phase 1. For purposes of a conservative analysis, this second scenario has been assumed in this construction noise analysis. Phase 3 would require two months of preparatory work beginning in March 2013, then 12 months of construction occurring over a two-year period beginning in May 2013. In addition, sub-phase Phase 3D, which consists of the renovation of the lower school buildings, would take place over a summer vacation period. In order to allow a degree of flexibility in the construction schedule and the school operating schedule, there is an option for Phase 3D to be completed during the summer of 2013 or 2014. In order to present the worst case scenario, construction noise has been analyzed to account for Phase 3D occurring during either of these years. Also note that each construction phase (i.e., Phase 1, Phase 2 and Phase 3) would begin with an approximate two month period of minor preparatory work, with more intensive construction activities beginning in approximately May of each phase, coinciding with the end of the school year.

(a) On-Site Construction Noise

Project construction will require the use of mobile heavy equipment with high noise level characteristics that would be clearly perceptible in classroom locations, as well as residential property locations that surround the project site. Individual pieces of construction equipment that would be used for project construction produce maximum noise levels of 74 to 91 dBA at a reference distance of 50 feet from the noise source. (Use of driven piles is not anticipated to be necessary during project construction.) These maximum noise levels would occur when equipment is operating under full power conditions or during “impact” activities such as jack hammering or sawing. Equipment used on construction sites often operate under less than full power conditions, or part power. Actual measurements performed while equipment is performing work indicate that shift-long equivalent L_{eq} sound levels are typically 2 to 15 dBA less than maximum noise levels. Throughout the total duration of construction activity, these noise levels would be further reduced to account for the percentage of time that equipment actually operate on the construction site.

Using the industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment), a maximum noise level of 97 dBA at a distance of 25 feet would be about 91 dBA at 50 feet, and 85 dBA at 100 feet. As heavy equipment passes near the project site boundary, the maximum noise level at a given moment along the property line could potentially reach as high as 95 dBA; however, as the equipment travels toward the center of the project site, the maximum noise level at the property line would diminish considerably into dBA levels in the 60s and 70s. These maximum noise levels would only be experienced intermittently at the property line, as only portions of the project site would be under construction at any one time. In addition, as shown in the Conceptual Site Plan provided in Section II, Project Description, the majority of the construction activities would be located within the more central areas of the site. Thus, the majority of the time construction noise levels at the property line would be much lower due to reduced construction activity and the phasing of construction (i.e., construction noise levels at a given location would be reduced as construction activities conclude or move to another more distant location of the project site).

To more accurately characterize construction-period noise levels, the average (L_{eq}) noise level associated with each construction stage is provided in Table IV.I-6 on page 313. These L_{eq} noise levels are based on the quantity, type and utilization rate for each for each piece and type of equipment that would be used during each construction stage, and are typically attributable to multiple pieces of equipment operating simultaneously. As shown in Table IV.I-6, the average construction-period noise level is expected to range from 77 dBA to 86 dBA at a reference distance of 50 feet.

The existing residential uses that surround the project site represent the noise-sensitive uses that would be most affected during project construction. Residential uses that are closest to the project site are located along Stansbury Avenue, Camino de la Cumbre and Camino de Solana. There are also sensitive receptors along other streets in the project vicinity including Beverly Ridge Drive, and Coy Drive. The following discussion provides a construction noise analysis of sensitive receptors in the project area. The sensitive receptors discussed are a representation of the sensitive receptors near the project site and noise levels at these additional receptors may be inferred based on the following analysis.

Construction-period noise levels at nearby sensitive receptors are presented in Table IV.I-7 on page 314. The majority of Phase 1 construction activity would be located within a more central location of the project site, north of the athletic field. Sensitive receptors along Camino de la Cumbre and Camino de Solana would experience the highest construction-related noise levels during this phase of construction activity. As shown in Table IV.I-7, Phase 1 construction noise levels are expected to be the highest in the vicinity of 3852 Camino de Solana. At this location, the hourly L_{eq} could potentially increase by 13 dBA, from 57 dBA to 70 dBA at the property line, during the site preparation and finishing stages of construction activity. During other construction stages (i.e., foundation construction and structure erection) the construction-period L_{eq} at the property line would be as high as 67 dBA, which would exceed the daytime ambient L_{eq} sound level of 57 dBA by 10 dBA. In addition, other sensitive receptors, including

Table IV.I-6

Construction Average L_{eq} Noise Levels by Distance and Construction Stage

Construction Stage	Sound Level in dBA (L_{eq}) at Indicated Distance				
	25 Feet	50 Feet	100 Feet	150 Feet	200 Feet
Demolition	92	86	80	76	74
Grading/Excavation	92	86	80	76	74
Foundations	83	77	71	67	65
Structural	89	83	77	73	71
Finishing	92	86	80	76	74

This assumes a hard surface propagation path drop-off rate of 6 dB per doubling of distance, which is appropriate for use in characterizing point-source (such as construction equipment) sound attenuation.

Source: EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; and PCR Services Corporation, 2006.

those along Camino de la Cumbre, Stansbury Avenue and Beverly Ridge Drive, would also experience noise levels in excess of City significance thresholds where the daytime hourly L_{eq} noise level could potentially increase by as much as 10 dBA. As noise level increases would exceed the 5 dBA significance threshold at multiple sensitive receptor locations during most stages of Phase 1 construction activity, construction-period noise impacts would be significant without implementation of mitigation measures.

The majority of Phase 2 construction would take place east of the elementary school building and along the eastern boundary of the project site. As shown in Table IV.I-7, construction-related noise levels would be the highest at 3852 Camino de Solana. At this location, the hourly L_{eq} could potentially increase by 9 dBA, from 57 dBA to 66 dBA at the property line, during the site preparation and finishing stages of construction activity. During other construction stages (i.e., foundation construction and structure erection) the construction-period L_{eq} at the property line would be approximately 63 dBA, which would exceed the daytime ambient L_{eq} sound level of 57 dBA by 6 dBA. Other sensitive receptors along Beverly Ridge Drive and Camino de la Cumbre would also experience noise levels in excess of City significance thresholds, where the daytime hourly L_{eq} noise level could potentially increase by up to 7 dBA. As noise level increases would exceed the 5 dBA significance threshold at multiple sensitive receptor locations during all stages of Phase 2 construction activity, construction-period noise impacts would be significant without implementation of mitigation measures.

Phase 3 construction activity is generally comprised of building renovations located throughout the project site. For purposes of this analysis, Phase 3 is further divided into sub phases to account for renovation or construction activities occurring in specific areas and during different times. Phase 3A would take place within the more central portion of the project site,

Table IV.I-7

Construction-Period Noise Impacts by Construction Phase and Receptor Location[a]

					Demolition		Grading/Excavation		Foundations		Structural		Finishing/Renovation	
Construction Phase	Representative Receptor Locations	Distance to Receptor (ft.)	Daytime Ambient Sound Level (dBA)	Direct Line of Sight?	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient
Phase 1 (New Library and Technology Center)	3636 Camino de la Cumbre	1404	50	Yes	57.0	7.0	57.0	7.0	48.0	0.0	54.0	4.0	57.0	7.0
	3767 Camino de la Cumbre	596	55	Yes	64.5	9.5	64.5	9.5	55.5	0.5	61.5	6.5	64.5	9.5
	3852 Camino de Solana	305	57	Yes	70.3	13.3	70.3	13.3	61.3	4.3	67.3	10.3	70.3	13.3
	3931 Camino de la Cumbre	412	55	No	62.7	7.7	62.7	7.7	53.7	0.0	59.7	4.7	62.7	7.7
	3943 Camino de la Cumbre	478	55	No	61.4	6.4	61.4	6.4	52.4	0.0	58.4	3.4	61.4	6.4
	3954 Camino de la Cumbre	543	55	No	60.3	5.3	60.3	5.3	51.3	0.0	57.3	2.3	60.3	5.3
	Beverly Ridge Drive	713	50	No	57.9	7.9	57.9	7.9	48.9	0.0	54.9	4.9	57.9	7.9
Phase 2 (New Middle and Upper School Main Academic Building and Parking Facility)	3636 Camino de la Cumbre	1553	50	Yes	56.2	6.2	56.2	6.2	47.2	0.0	53.2	3.2	56.2	6.2
	3767 Camino de la Cumbre	780	55	Yes	62.1	7.1	62.1	7.1	53.1	0.0	59.1	4.1	62.1	7.1
	3852 Camino de Solana	483	57	Yes	66.3	9.3	66.3	9.3	57.3	0.3	63.3	6.3	66.3	9.3
	3931 Camino de la Cumbre	436	55	No	62.2	7.2	62.2	7.2	53.2	0.0	59.2	4.2	62.2	7.2
	3943 Camino de la Cumbre	473	55	No	61.5	6.5	61.5	6.5	52.5	0.0	58.5	3.5	61.5	6.5
	3954 Camino de la Cumbre	482	55	No	61.3	6.3	61.3	6.3	52.3	0.0	58.3	3.3	61.3	6.3
	Beverly Ridge Drive	889	50	No	56.0	6.0	56.0	6.0	47.0	0.0	53.0	3.0	56.0	6.0
Phase 3A (New Academic Building West)	3636 Camino de la Cumbre	777	50	Yes	62.2	12.2	62.2	12.2	53.2	3.2	59.2	9.2	62.2	12.2
	3767 Camino de la Cumbre	786	55	Yes	62.1	7.1	62.1	7.1	53.1	0.0	59.1	4.1	62.1	7.1
	3852 Camino de Solana	452	57	Yes	66.9	9.9	66.9	9.9	57.9	0.9	63.9	6.9	66.9	9.9
	3931 Camino de la Cumbre	347	55	No	64.2	9.2	64.2	9.2	55.2	0.2	61.2	6.2	64.2	9.2
	3943 Camino de la Cumbre	392	55	No	63.1	8.1	63.1	8.1	54.1	0.0	60.1	5.1	63.1	8.1
	3954 Camino de la Cumbre	409	55	No	62.7	7.7	62.7	7.7	53.7	0.0	59.7	4.7	62.7	7.7
	3957 Camino de la Cumbre	495	55	No	61.1	6.1	61.1	6.1	52.1	0.0	58.1	3.1	61.1	6.1
	Beverly Ridge Drive	834	50	No	56.6	6.6	56.6	6.6	47.6	0.0	53.6	3.6	56.6	6.6
Phase 3B (Addition and Renovation of Academic Building South)	3636 Camino de la Cumbre	1129	50	Yes	58.9	8.9	58.9	8.9	49.9	0.0	55.9	5.9	58.9	8.9
	3767 Camino de la Cumbre	357	55	Yes	68.9	13.9	68.9	13.9	59.9	4.9	65.9	10.9	68.9	13.9
	3852 Camino de Solana	299	57	Yes	70.5	13.5	70.5	13.5	61.5	4.5	67.5	10.5	70.5	13.5
	Beverly Ridge Drive	782	50	No	57.1	7.1	57.1	7.1	48.1	0.0	54.1	4.1	57.1	7.1
Phase 3C (Disney Pavilion)	3636 Camino de la Cumbre	1174	50	Yes	58.6	8.6	58.6	8.6	49.6	0.0	55.6	5.6	58.6	8.6
	3767 Camino de la Cumbre	444	55	Yes	67.0	12.0	67.0	12.0	58.0	3.0	64.0	9.0	67.0	12.0
	3852 Camino de Solana	385	57	Yes	68.3	11.3	68.3	11.3	59.3	2.3	65.3	8.3	68.3	11.3
	Beverly Ridge Drive	867	50	No	56.2	6.2	56.2	6.2	47.2	0.0	53.2	3.2	56.2	6.2
	3636 Camino de la Cumbre	965	50	Yes	60.3	10.3	60.3	10.3	51.3	1.3	57.3	7.3	60.3	10.3
	3767 Camino de la Cumbre	409	55	Yes	67.7	12.7	67.7	12.7	58.7	3.7	64.7	9.7	67.7	12.7
	3852 Camino de Solana	578	57	Yes	64.7	7.7	64.7	7.7	55.7	0.0	61.7	4.7	64.7	7.7
	Beverly Ridge Drive	894	50	No	55.9	5.9	55.9	5.9	46.9	0.0	52.9	2.9	55.9	5.9

Table IV.I-7 (Continued)

Construction-Period Noise Impacts by Construction Phase and Receptor Location[a]

Construction Phase	Representative Receptor Locations	Distance to Receptor (ft.)	Daytime Ambient Sound Level (dBA)	Direct Line of Sight?	Demolition		Grading/Excavation		Foundations		Structural		Finishing/Renovation	
					dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient
Phase 3D (Lower School Renovations)	3636 Camino de la Cumbre	1744	50	Yes	55.1	5.1							55.1	5.1
	3767 Camino de la Cumbre	937	55	Yes	60.5	5.5							60.5	5.5
	3852 Camino de Solana	556	57	Yes	65.1	8.1							65.1	8.1
	3920 Stansbury Avenue	286	60	No	65.9	5.9							65.9	5.9
	3929 Stansbury Avenue	282	60	No	66.0	6.0							66.0	6.0
	3931 Camino de la Cumbre	251	55	No	67.0	12.0	**Renovation Only**						67.0	12.0
	3943 Camino de la Cumbre	245	55	No	67.2	12.2							67.2	12.2
	3954 Camino de la Cumbre	218	55	No	68.2	13.2							68.2	13.2
	3957 Camino de la Cumbre	338	55	No	64.4	9.4							64.4	9.4
	Beverly Ridge Drive	793	50	No	57.0	7.0							57.0	7.0

[a] *All noise levels represent conditions at the property line closest to the project site. All receptors were analyzed for each phase, but only receptors in which noise levels exceeded the +5 dBA threshold are presented. All other receptors would not exceed the 5 dBA significance threshold. A complete analysis is presented in Appendix J*

[b] *The ambient noise level is based on the average L_{eq} during construction hours (i.e., 7:00 A.M. to 5:00 P.M.) obtained from a noise measurement taken at 3931 Camino de la Cumbre. This noise measurement was assumed to be representative of other residences located along Camino de la Cumbre.*

[c] *The ambient noise level is based on the average L_{eq} during construction hours (i.e., 7:00 A.M. to 5:00 P.M.) obtained from a noise measurement taken at 3852 Camino de Solana. This noise measurement was assumed to be representative of other residences located along Camino de Solana.*

[d] *The ambient noise level is based on the average L_{eq} during construction hours (i.e., 7:00 A.M. to 5:00 P.M.) obtained from a noise measurement taken near the boundary of the project site and Stansbury Avenue.*

[e] *Ambient noise levels are based on presumed ambient noise levels for residential areas pursuant to the city of Los Angeles Noise Regulation. LAMC Section 111.03.*

[f] *Subphases of Phase 3 could take place concurrently. If this were to occur, noise levels would increase by 3 dBA at each sensitive receptor.*

Source: PCR Services Corporation, 2006 near the current parking lot. Phases 3B and 3C are expected to be developed concurrently and would take place within the southern portion of the project site, near the athletic fields. Phase 3D consists mainly to renovations to the lower school buildings located in the northern portion of the project site, near the entrance gate. Sensitive receptors along Camino de la Cumbre and Camino de Solana would experience the highest construction-related noise levels during Phase 3. Since Phase 3 consists of renovation throughout the entire campus, different sensitive receptors are impacted due to the various areas of construction activity. As shown in Table IV.I-7, Phase 3 construction noise levels would be the highest at residence locations situated along Camino de la Cumbre, where the hourly L_{eq} could potentially increase by 14 dBA, from 55 dBA to 69 dBA at the property line, during the site preparation and renovation/finishing stages of Phase 3B. Other sensitive receptors, including those along Stansbury Avenue, Beverly Ridge Drive and Camino de Solana would also experience noise levels that exceed City significance thresholds, where the daytime hourly L_{eq} noise level could potentially increase by 1 dBA to 13 dBA. As noise level increases would exceed the 5 dBA significance threshold at multiple sensitive receptor locations during all stages of Phase 3 construction activity, construction-period noise impacts would be significant without implementation of mitigation measures.

It is important to note that the subphases of Phase 3 construction could take place concurrently. If this scenario were to occur, the construction-period noise level increases provided in Table IV.I-7 could increase by as much as 3 dBA at each surrounding residential receptor location. Under this scenario, the maximum noise level increase reaches a level as high as 17 dBA over baseline ambient noise conditions in the vicinity of the 3767 Camino de la Cumbre receptor location. The maximum noise level increase at all other receptor locations could range from 9 dBA to 15 dBA over baseline ambient noise conditions.

The preceding ranges for construction-period daytime L_{eq} would apply during days of heavy construction activity. Of course, the conservative estimate of high L_{eq} noise levels used in this analysis would be reduced for each respective construction stage (e.g., grading, excavation, etc.) during days of reduced construction activity. In addition, existing and future buildings would provide some noise attenuation during construction activity. Regardless, the project would result in significant construction noise impacts without implementation of mitigation measures during all phases on construction.

Regarding on-site (i.e., The Buckley School campus) noise impacts, students and faculty members that are present on the project site during construction activities would also experience significant noise impacts during all Phases of construction. On-site noise from construction could reach levels in excess of 90 dBA on portions of the school property during portions of the construction period. Similar to off-site receptor locations, noise levels would diminish as the distance between the noise source (i.e., actual construction activity) and receptor locations increase.

(b) Off-Site Construction Noise

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the site throughout the construction duration. Construction workers would arrive from many parts of the region, and thus from different directions, although the majority of workers would likely arrive at the project site from the north via Stansbury Avenue. The majority of haul trucks receiving soil and debris would generally travel to the project site via Stansbury Avenue north of Valley Vista Boulevard. In addition, delivery, concrete, and special oversize trucks would likely arrive at the project site via Stansbury Avenue north of Valley Vista Boulevard or Van Nuys Boulevard. Based on the proposed truck routes and vehicle trips associated with construction workers, the following four roadway segments were analyzed for potential impacts associated with construction-related vehicular traffic:

- Stansbury Boulevard, between school gate and Valley Vista Boulevard
- Stansbury Boulevard, north of Valley Vista Boulevard
- Valley Vista Boulevard, west of Van Nuys Boulevard
- Valley Vista Boulevard, east of Van Nuys Boulevard

The construction-related vehicular noise analysis was completed utilizing the existing lowest hourly traffic volumes combined with peak-hour construction traffic volumes to ascertain the maximum incremental change (hourly L_{eq}) in the ambient noise level. In addition, the increase in CNEL due to construction-period traffic volumes was also calculated. Baseline roadway volumes for year 2005 were compared to a roadway volume scenario that included vehicle trips associated with construction. Construction worker vehicles, haul trucks, and delivery trucks were added to the baseline traffic volumes to arrive at a construction-period traffic scenario.

Table IV.I-8 on page 318 provides a conservative estimate of high noise levels due to construction traffic volumes for each of the four analyzed roadway segments. The following noise levels are provided: baseline conditions, baseline with construction traffic; and the increase attributable to the construction-generated traffic. As shown, the largest construction traffic noise impact with respect to hourly L_{eq} is anticipated to occur along the segment of Stansbury Avenue, between the school gate and Valley Vista Boulevard, where construction-related traffic volumes would cause overall roadway noise to increase by 13.0 dBA L_{eq} (1-hour). With respect to increase in CNEL, the largest noise increase would occur along the same segment of Stansbury Avenue where CNEL would increase by approximately 11.2 dBA. Noise levels would exceed the 5-dB significance criterion along each of the four analyzed roadway segments; therefore, construction-period roadway noise impacts are considered significant.

Table IV.I-8

Calculated Future Traffic Noise Levels During Construction

	Calculated Future CNEL (dBA) and Hourly L_{eq} at 50 Feet from Roadway Right-of-Way						
	Baseline (Year 2006)		Baseline with Construction		Construction-Period Roadway Noise Impact		
Roadway Segment	**CNEL**	**Peak Hour L_{eq}**	**CNEL**	**Peak Hour L_{eq}**	**CNEL**	**Max L_{eq} Increase [a]**	**Significant?**
Stansbury Avenue, between School Gate and Valley Vista Boulevard	49.1	56.7	60.3	64.9	+11.2	+13.0	Yes
Stansbury Avenue, north of Valley Vista Boulevard	51.5	57.0	59.6	64.0	+8.1	+11.1	Yes
Valley Vista Boulevard, west of Stansbury Avenue	52.6	57.1	57.3	61.4	+4.7	+7.3	Yes
Valley Vista Boulevard, East of Stansbury Avenue	52.4	55.8	54.9	58.4	+2.4	+4.1	No

[a] *Peak Hour L_{eq} may occur at different times of the day. Maximum L_{eq} increase may not occur during the peak hour scenario.*

Source: PCR Services Corporation, 2006.

It is important to note that this impact would result from a very high construction traffic volume scenario that could potentially occur during the peak day of the most intense stage of construction activity (i.e., the approximately 3-month period of concrete truck traffic related to Phase 2 construction activities) where construction traffic comprises the highest percentage of total traffic volumes. In order to determine potential noise increases during all periods of construction, construction traffic noise was also analyzed for all phases of the project along each of the four segments. As shown in Table IV.I-9 on page 319, all other CNEL increases along the analyzed segments would be less than 8.1 dBA for the duration of construction. However, as previously mentioned, these noise level increases would occur during the most intense stages of each phase. Average CNEL increases along the analyzed segments would range from 6.6 dBA to 0.1 dBA for the duration of the project.

During all other phases, construction traffic would also cause noise levels at the analyzed segments to exceed the 5-dB significance threshold. However, the increase in noise levels would be primarily limited to concrete or haul truck trips. During Phase 1, construction traffic is expected to increase noise levels beyond the 5 dBA threshold for 42% of the time or 5 months of the phase duration. Construction traffic during Phase 2 would exceed the threshold for 85% of the time or for 17 months of the phase duration. Phase 3 would exceed the threshold for approximately 42% of the time for all sub phases with the exception of Phase 3D which primarily consists of renovation activities. Construction traffic during Phase 3D is not expected to increase noise levels beyond the 5 dBA threshold. As such, mobile noise during other

Table IV.I-9

Calculated Future Construction Traffic Noise Increases (dBA) For All Phases

Phase	Factor	Scenario [a]	Stansbury Avenue, between School Gate and Valley Vista Boulevard	Stansbury Avenue, north of Valley Vista Boulevard	Valley Vista Boulevard, west of Stansbury Avenue	Valley Vista Boulevard, East of Stansbury Avenue
Phase 1	CNEL	Avg	+3.6	+0.5	<0.1	<0.1
		Max	+7.4	+4.3	+0.9	<0.1
Phase 2		Avg	+6.6	+3.5	+0.1	<0.1
		Max	+11.2	+8.1	+4.7	+2.4
Phase 3A		Avg	+3.7	+0.6	<0.1	<0.1
		Max	+7.4	+4.3	+0.9	<0.1
Phase 3B		Avg	+3.5	+0.4	<0.1	<0.1
		Max	+7.0	+3.9	+0.5	<0.1
Phase 3C (Disney Pavilion)		Avg	+3.5	+0.4	<0.1	<0.1
		Max	+7.9	+4.8	+1.4	<0.1
Phase 3C (Aquatic Center)		Avg	+2.9	<0.1	<0.1	<0.1
		Max	+6.6	+3.5	+0.1	<0.1
Phase 3D		Avg	<0.1	<0.1	<0.1	<0.1
		Max	+1.6	<0.1	<0.1	<0.1
Phase 1	L_{eq}	Avg	+5.4	+3.5	<0.1	<0.1
		Max	+9.2	+7.3	+3.5	+0.3
Phase 2		Avg	+8.4	+6.5	+2.7	<0.1
		Max	+13.0	+11.1	+7.3	+4.1
Phase 3A		Avg	+5.5	+3.6	<0.1	<0.1
		Max	+9.2	+7.3	+3.5	+0.3
Phase 3B		Avg	+5.3	+3.4	<0.1	<0.1
		Max	+8.8	+6.9	+3.1	<0.1
Phase 3C (Disney Pavilion)		Avg	+5.3	+3.4	<0.1	<0.1
		Max	+9.7	+7.8	+4.0	+0.8
Phase 3C (Aquatic Center)		Avg	+4.7	+2.8	<0.1	<0.1
		Max	+8.4	+6.5	+2.7	<0.1
Phase 3D		Avg	+1.7	<0.1	<0.1	<0.1
		Max	+3.4	+1.5	<0.1	<0.1

[a] *Average Scenario represents the average number of vehicle trips during the specified phase. Maximum scenario represents the maximum number of vehicles during the specified phase.*

Source: PCR Services Corporation, 2006

construction periods and along all other roadway segments would be reduced, but would remain significant.

(2) Long-Term Operations Noise

This section provides a summary discussion of potential noise and ground-borne vibration impacts related to the long-term operations of The Buckley School Campus Enhancement Plan, following completion of construction, to neighboring residential properties. Specific noise sources considered herein include roadway noise; mechanical equipment/point sources; parking facility; and outdoor athletic activity noise (i.e., athletic field and competition pool).

(a) Off-Site Roadway Noise

According to the project traffic study, included as Appendix L to this EIR, the project is expected to generate an additional 329 daily trips due to increased enrollment and additional staff prior to traffic mitigation measures (please see Section IV.J, Transportation and Circulation). Thus, traffic attributed to project improvements represents a nominal increase in traffic over the total daily traffic traveling along the local roadways. This increase in traffic generation was analyzed to determine if any traffic related noise impacts would occur as part of the improvements. Table IV.I-10 on page 321 provides the calculated CNEL for the analyzed roadway segments for the following scenarios: existing conditions, future without development of the project; future with development of the project; the increase attributed to project-generated traffic, and the cumulative increase above existing noise levels.

As shown in Table IV.I-10, the largest project-related and cumulative traffic-related noise impact is anticipated to occur along the segment of Stansbury Avenue, south of Valley Vista Boulevard. Project-related traffic would add 0.5 dBA CNEL to this roadway segment, while related project plus ambient growth traffic volumes are expected to add an additional 0.2 dBA CNEL to this roadway segment. This change in noise level predicted along Stansbury Avenue provides a conservative estimate of the potential project-related impact given that the intent of the TDM plan is to reach a goal of no new net trips. In addition, the project would also reduce queuing of cars along Stansbury Avenue which could also reduce off-site roadway noise levels. The largest cumulative traffic-related noise impact is anticipated to occur along two segments; Valley Vista Boulevard, east of Stansbury Avenue and Stansbury Avenue, north of Valley Vista Boulevard. Also shown in Table IV.I-10, the cumulative traffic-related noise impact to these roadway segments would be 1.1 dBA CNEL, which falls well below the 5 dBA CNEL significance threshold. In addition, future traffic noise levels would remain within the "normally acceptable" category (i.e., between 50 and 60 dBA CNEL) and/or "conditionally acceptable" (i.e., between 55 and 70 dBA CNEL) category per the City's Land Use Compatibility Matrix for Community Noise (refer to Table IV.I-1 on page 300) for residential areas. Thus, roadway traffic noise related to project development would be less than significant and no mitigation measures would be required. Furthermore, with implementation of the TDM plan, traffic noise would be further reduced.

Table IV.I-10

Calculated Future Traffic Noise Levels at Project Buildout

Roadway Segment	Existing CNEL	Calculated Future CNEL (dBA) at Roadway Right-of-Way: Future No Project	Future with Project	Project Increment [a]	Cumulative Increment [b]	Significant?
Stansbury Avenue, north of Valley Vista Boulevard	56.7	57.6	57.8	0.2	1.1	No
Stansbury Avenue, south of Valley Vista Boulevard	55.1	55.3	55.8	0.5	0.7	No
Valley Vista Boulevard, east of Stansbury Avenue	57.5	58.6	58.6	0.0	1.1	No
Valley Vista Boulevard, west of Stansbury Avenue	58.0	58.9	59.0	0.1	1.0	No
Greenleaf Street, west of Stansbury Avenue	53.7	54.4	54.4	0.0	0.7	No
Dickens Street, west of Stansbury Avenue	56.8	57.5	57.5	0.0	0.7	No
Camino de la Cumbre, west of Stansbury Avenue	52.1	52.8	52.8	0.0	0.7	No
Camino de la Cumbre, south of Valley Vista Boulevard	51.2	51.9	52.0	0.1	0.8	No

[a] *Increase relative to traffic noise levels associated with ambient growth without the project compared with ambient growth plus project development.*

[b] *Cumulative increase relative to existing traffic noise levels, resulting from ambient growth and related projects, plus project development prior to the implementation of the TDM plan.*

Source: PCR Services Corporation, 2005.

(b) Stationary Point-Source Noise

This section considers potential noise impacts to neighboring residential properties related to specific noise sources associated with the proposed Buckley School Campus Enhancement Plan.

(i) Rooftop Equipment/Central Plant

Some individual air handling units and exhaust fans would be located on the roofs of the new buildings in order to provide for the ventilation and air-conditioning of these buildings. Also, the proposed central plant containing cooling water towers and an enclosed chiller would be located along the eastern boundary of campus. Detailed information regarding the mechanical design and selection of equipment is yet to be finalized. Thus, an analysis was performed to determine the maximum allowable noise levels to be generated by rooftop equipment or the central plant without exceeding significance thresholds. As a result, the following noise limits for outdoor mechanical equipment are recommended to ensure that the project will meet the established LAMC noise criteria:

- Noise generated by rooftop mechanical equipment including the air handling unit and exhaust fan shall not exceed seventy (70) dBA at a distance of 10 feet from the equipment.
- Noise generated by the cooling tower shall not exceed seventy (70) dBA at a distance of 25 feet from all sides of the equipment.
- Noise generated by the chiller room, through ventilation openings or exhaust fans, shall not exceed seventy (70) dBA at a distance of 25 feet.
- The mechanical design should be reviewed by a qualified acoustical consultant to ensure that the design will meet the project noise criteria prior to construction.

Implementation of the project design features provided above, would ensure that rooftop equipment noise levels do not exceed 50 dBA during daytime operations, or 40 dBA during nighttime operations at any property line. Design features may include use of sound attenuation enclosures and/or sound attenuation of air inlet and discharge paths such that noise emissions from such mechanical equipment and pathways remain within Noise Ordinance limits. Thus, when added to the presumed daytime and nighttime ambient noise levels of 50 dBA and 40 dBA, respectively, mechanical equipment generated noise levels would result in a maximum marginal noise level increase of 3 dBA to both the daytime and nighttime noise environments. This noise level increase would be below the 5 dBA significance threshold. As such, noise impacts related to mechanical equipment operations would be less than significant and no mitigation measures would be required.

(ii) Parking Facility

The proposed project would include an enclosed parking facility located under the new Middle and Upper School Main Academic Center in the center of the project site. The facility would replace the existing 214-space surface parking lot and various smaller lots throughout the campus, which would serve to eliminate some of the school's existing surface parking area noise sources. Various noise events would occur within the proposed parking facility. The activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals would occur periodically. A summary of noise levels related to typical parking facility noise events is provided in Table IV.I-11 on page 323. Automobile movements would comprise the most continuous noise source and would generate a maximum noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events, which generate maximum noise levels as

Table IV.I-11

Typical Maximum Noise Level From Individual Parking Structure-Related Noise Events

Source	Reference Sound Level [a]	Reference Distance	Maximum Sound Level at 50 Feet [b]	Frequency of Occurrence	1-Hour L_{eq} Noise Level at 50 Feet	Significant?
Automobile at 14 mph	65 dBA	25 feet	59 dBA	50 percent	56 dBA	No
Car Alarm	75 dBA	25 feet	69 dBA	1 percent	49 dBA	No
Car Horn	75 dBA	25 feet	69 dBA	0.5 percent	46 dBA	No
Door Slam	70 dBA	25 feet	64 dBA	5 percent	51 dBA	No
Tire Squeal	80 dBA	10 feet	70 dBA	10 percent	56 dBA	No
Composite L_{eq} (1-hour)					**60 dBA**	No

[a] *Reference noise levels are based on actual measurement data.*

[b] *Since parking structure-related noise is more akin to a point-source, rather than a line-source, the 6-dBA per doubling of distance attenuation factor was used to distance-adjust all reference noise levels.*

Source: PCR Services Corporation, 2005.

high as 69 dBA at a reference distance of 50 feet, would occur less frequently. As demonstrated in Table IV.I-11, a composite noise level of 60 dBA L_{eq} (1-hour) at a reference distance of 50 feet was used to represent the average parking facility-generated noise level. As indicated above, the parking facility would be enclosed and, therefore, offsite noise levels from existing parking activities may actually decrease due to noise attenuation from the structure. In addition, the vehicular entrance to the parking facility would be from the north with pedestrian access provided to the school to the west. As shown in the conceptual site plan, these openings would be internal to the site with existing and proposed buildings located further to the west. Thus, parking facility-related noise levels would not exceed the 5 dBA significance threshold at any residence located immediately north or west of the proposed parking facility. As a result, potential noise impacts that may result due to the parking facility would be less than significant and no mitigation measures would be required.

(c) Outdoor Athletic Activity

As described in Section II, Project Description of this EIR, project implementation would involve reconfiguring the outdoor athletic activity areas. Specifically, a new Aquatic Center would be built in the location of the current outdoor basketball and weight facility located on the east side of the athletic field. The pool facility would include approximately 3,330 square feet for lockers, restrooms, a training room and office, and storage. The Aquatic Center would likely be built entirely on the existing Buckley campus, but may be built in the location of the current outdoor basketball and weight facility located at the northeast corner of the athletic field, nestled into the adjacent hillside and utilizing a portion of land currently owned by the SMMC, subject to future negotiations with SMMC. Placement of the Aquatic Center utilizing a portion of the existing encroachment on SMMC land would limit views of the facility from the north, south, and west. To provide for a conservative high estimate of potential noise impacts to nearby residences, this impact analysis assumes that all outdoor athletic activity areas would generate noise simultaneously. Future noise levels were estimated using sound measurement data of existing outdoor athletic events collected from the project site and data from similar projects.

Table IV.I-12 on page 325 compares the combined monitored ambient background noise level and future no project athletic activity L_{eq} values to the combined monitored ambient background noise level and future with project athletic activity L_{eq} values at residential property line locations. As shown in Table IV.I-12, the athletic field activities would increase noise levels in the vicinity of residential property locations by a maximum of 4.4 dBA L_{eq}, which is less than the City's 5-dB significance criterion.

Table IV.I-13 on page 326 also compares the future no project L_{max} values to future with project L_{max} values at residential property line locations. As shown therein, the athletic field activity-related L_{max} noise level in the vicinity of residential property locations would increase by a maximum of 2.8 dBA, which is less than the 3-dB significance criterion. In addition, a change in the outdoor level that is less than 3 dB will not be discernable to most people.

As mentioned previously, the outdoor Aquatic Center may be built on the location of the current basketball court located approximately 80 feet from the proposed site. Placing the Aquatic Center in this location would actually move it further away from sensitive receptors and thus reduce the overall noise impacts. With the aquatic center placed in this location, noise levels affecting sensitive receptors would be equal to or less than those presented in Tables IV.I-12 and IV.I-13.

(3) Ground-Borne Vibration during Construction

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. As discussed above, the FTA has published standard vibration velocities for construction equipment operations. The peak particle velocities (PPV) for construction equipment pieces that are expected to be used during project construction are listed in Table IV.I-14 on page 327. As indicated in Table IV.I-14, vibration velocities from typical heavy construction equipment that would be used during project construction range from 0.003 to 0.089 inch/sec PPV at 25 feet from the source of activity. At 75 feet from the source of activity, vibration velocities range from 0.001 to 0.017 inch/sec PPV.

Table IV.I-12

Estimated L_{eq} Noise Levels at Off-site Receptors due to Athletic Activities, dBA

	Average Noise Levels (L_{eq}) at Noise Receptor Locations (Future No-Project/Future With Project)				
	A	**B**	**C**	**D**	**E**
Athletic Activity					
Football/Soccer/Softball[a]	61/61	40/40	46/46	39/39	35/35
Basketball	31/42	20/24	25/32	21/24	19/20
Swimming[b]	NA/61	NA/47	NA/36	NA/31	NA/34
Combined Athletic Activity	62.0/64.5	42.2/48.2	47.5/47.9	41.2/41.6	37.2/38.9
Ambient Background	48	41	57	55	60
Combined Ambient and Athletic Activity Noise Level	62.1/64.6	44.6/49.0	57.5/57.5	55.2/55.2	60.0/60.0
Change in Noise Level	+2.5	+4.4	<0.1	<0.1	<0.1
Significant Impact	No	No	No	No	No

[a] *Softball game generates the highest noise level as it is closest to the sound receptor.*
[b] *NA; future condition only.*

Source: ARUP and PCR Services Corporation, 2006.

With regard to the proposed project, ground-borne vibration would be generated primarily during the site clearing, excavation, and grading processes when heavy materials are moved. The PPV from bulldozer and heavy truck operations is shown to be 0.089 PPV and 0.076 PPV, respectively, at a distance of 25 feet. The majority of construction activity would be further than 100 feet from the nearest sensitive receptor and thus well below the PPV threshold of 0.2 inch/sec.

Phase 2 construction activity (i.e., the parking structure and academic buildings) would be located as close as approximately 400 feet from sensitive receptors. This activity would include caisson drilling and excavating. As shown in Table IV.I-14, PPV levels from caisson drilling and heavy equipment at distances of 25 feet would still be well below the PPV threshold of 0.2 inch/sec. Therefore, vibration impacts associated with construction would be less than significant and no mitigation measures would be required.

(4) Ground-Borne Vibrations during Project Operations

Future ground-borne vibration in the project vicinity will continue to be generated by vehicular travel on the local roadways. Project operation would not result in any additional on- or off-site long-term ground-borne vibration sources. As such, continued operation of the School following its proposed improvement would not cause ground-borne vibration levels to exceed the

Table IV.I-13

Estimated L_{max} Noise Levels at Off-site Receptors due to Athletic Activities, dBA

	Average Noise Levels (L_{max}) at Noise Receptor Locations (Future No-Project/Future With Project)				
	A	**B**	**C**	**D**	**E**
Athletic Activity					
Football/Soccer	72/72	55/55	60/60	53/53	52/52
Softball[a]	77/77	56/56	62/62	55/55	51/51
Basketball	56/66	43/47	49/56	45/48	42/43
Swimming[b]	NA/72	NA/58	NA/47	NA/41	NA/45
Combined Maximum Noise Level	78.2/79.3	58.7/61.4	64.3/64.8	57.4/57.7	54.8/55.3
Ambient Background	48	41	57	55	60
Combined Ambient and Athletic Activity Noise Level	78.2/79.3	58.7/61.5	65.0/65.5	59.4/59.6	61.1/61.3
Change in Noise Level	+1.1	+2.8	+0.5	+0.2	+0.2
Significant Impact	No	No	No	No	No

[a] *Softball game generates the highest noise level as it is closest to the sound receptor.*
[b] *NA; future condition only.*

Source: ARUP and PCR Services Corporation, 2006.

0.2 inch per second PPV significance threshold at any structure location. As such, impacts would be less than significant and no mitigation measures are required.

3. CUMULATIVE IMPACTS

(1) Construction Noise

Noise from construction of the proposed project, and related projects, would be localized, thereby potentially affecting areas immediately surrounding or between each particular project site. In addition to the 29 identified related projects, renovation and improvement of residential properties in the neighborhoods surrounding the school site is a regular occurrence and may last from less than a month to more than one year with highly variable noise implications. The nearest listed related project to the proposed project is the 16,500 square foot shopping center proposed at 14121 Ventura Boulevard, which is located about 0.5 mile north of the project site. Thus, due to distance attenuation alone, construction noise from one site would not result in a noticeable increase in noise at sensitive receptors near the other project site. Furthermore, each of the related projects would be required to comply with the noise regulations set forth by the Los Angeles Municipal Code and subject to noise-limiting mitigation measures similar to those

Table IV.I-14

Vibration Velocities for Construction Equipment

Equipment	Approximate Peak particle Velocity at 25 ft, inch/second	Approximate Peak Particle Velocity at 75 ft, inch/second
Large bulldozer	0.089	0.017
Caisson drilling	0.089	0.017
Loaded trucks	0.076	0.015
Jackhammer	0.035	0.007
Small bulldozer	0.003	0.001

Note: The ground-borne vibration significance threshold is 0.2 PPV.

Source: USDOT Federal Transit Administration, 1995.

prescribed for the proposed project. As such, cumulative impacts associated with construction noise would be less than significant.

(2) Roadway Noise

As previously indicated in Table IV.I-10, the cumulative increase in future CNEL traffic noise levels at project buildout with future ambient growth relative to the existing baseline, would be 1.1 dB or less in areas that can potentially be affected by the proposed project. This increase would not be perceptible and would be less than significant.

(3) Long-Term Operations

The project site and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise from lawn maintenance activities, mechanical equipment (e.g., air conditioning systems), and vehicle movements, among other community noise sources. As demonstrated above, noise impacts related to continued operation of the project site would be less than significant. In addition, the closest related project is located approximately within 0.5 miles to the north of the project site. As such, cumulative noise impacts related to long-term project operations would be less than significant.

(4) Ground-Borne Vibration

Ground-borne vibration impacts from equipment that would be used during project construction and operations are localized. As such, there is also no potential for cumulative ground-borne vibration impacts. Ground-borne vibration would be generated primarily during the site clearing, excavation, and grading processes when heavy materials are moved. The peak particle velocity from bulldozer and heavy truck operations would be 0.089 ppv and 0.076 ppv, respectively, at a distance of 25 feet. As these values are well below the ppv threshold of 0.2, cumulative vibration impacts associated with project construction and operation would be less than significant. No mitigation measures are required.

4. MITIGATION MEASURES

a. Construction

Because noise associated with on-site construction activity would have the potential to result in a significant impact, the following measures are prescribed to minimize construction-related noise impacts:

Mitigation Measure I-1: Engine idling from construction equipment such as bulldozers and haul trucks shall be limited, to the extent feasible.

Mitigation Measure I-2: All construction equipment shall be fitted with residential grade mufflers, where readily available in the construction equipment fleet that regularly serves the City of Los Angeles. Prospective contractors shall demonstrate a good faith effort to locate such construction equipment for use throughout the duration of project construction.

Mitigation Measure I-3: An 8-foot temporary sound barrier (e.g., wood fence) shall be erected along portions of the north and northwest property lines to limit the "line of sight" of construction activity from the adjacent residential properties that are located immediately north and northwest of proposed construction areas.

b. Operations

As discussed above, no significant noise impacts would result from operation of the proposed project, thus no mitigation measures would be required.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

As shown in Table IV.I-15 on page 330, construction-period noise impacts after implementation of mitigation measures would be the highest at multiple residence locations situated along Camino de la Cumbre and Stansbury Avenue. At some residence locations along these two streets, the hourly L_{eq} could potentially increase by as much as 10 dBA over baseline ambient noise conditions. Other sensitive receptors, including those along Camino de Solana and Beverly Ridge Drive would also experience noise levels that exceed City significance thresholds, where the daytime hourly L_{eq} noise level after implementation of mitigation measures could potentially increase by as much as 5 dBA. Noise impacts during construction would continue to exceed the 5 dBA significance criterion at multiple receptor locations during all project construction phases even with implementation of feasible mitigation measures. As such, construction-period noise impacts would be temporary, significant and unavoidable.

In addition, roadway noise attributable to construction traffic volumes will exceed the 5-dBA significance threshold along the following roadway segments during various portions of the construction period: Valley Vista Boulevard, west of Stansbury Avenue; Valley Vista Boulevard, East of Stansbury Avenue; Stansbury Avenue, between School Gate and Valley Vista Boulevard; and Stansbury Avenue, north of Valley Vista Boulevard. As there is no feasible mitigation to reduce these impacts, roadway noise impacts during construction would be temporary, significant and unavoidable.

In compliance with provisions of the LAMC, all technically feasible mitigation measures were prescribed to reduce noise levels from construction activity. While the L_{eq} noise level is anticipated to remain below 75 dBA at all residential property line locations within the project vicinity, the maximum noise level may intermittently exceed 75 dBA at nearby property locations for the duration of the construction period.

b. Operations

As discussed above, no significant impacts associated athletic field noise, long-term roadway noise, or mechanical equipment/stationary-source noise were identified. As such, noise impacts related to these elements of long-term project operations would be less than significant.

Table IV.I-15

Construction-Period Noise Impacts by Construction Phase and Receptor Location with Mitigation

Construction Phase	Representative Receptor Locations	Distance to Receptor (ft.)	Daytime Ambient Sound Level (dBA)	Mitigation (dBA)[f]	Demolition dBA (L_{eq})	Demolition Increase over Ambient	Grading/Excavation dBA (L_{eq})	Grading/Excavation Increase over Ambient	Foundations dBA (L_{eq})	Foundations Increase over Ambient	Structural dBA (L_{eq})	Structural Increase over Ambient	Finishing/Renovation dBA (L_{eq})	Finishing/Renovation Increase over Ambient
Phase 1 (New Library and Technology Center)	3767 Camino de la Cumbre	596	55	3	61.5	6.5	61.5	6.5	52.5	0.0	58.5	3.5	61.5	6.5
	3852 Camino de Solana	305	57	8	62.3	5.3	62.3	5.3	53.3	0.0	59.3	2.3	62.3	5.3
Phase 2 (New Middle and Upper School Main Academic Building and Parking Facility)	Receptors closest to Phase 2 did not exceed the 5 dBA threshold. Please see Appendix J for complete analysis.													
Phase 3A (New Academic Building West)	3931 Camino de la Cumbre	347	55	3	61.2	6.2	61.2	6.2	52.2	0.0	58.2	3.2	61.2	6.2
	3943 Camino de la Cumbre	392	55	3	60.1	5.1	60.1	5.1	51.1	0.0	57.1	2.1	60.1	5.1
Phase 3B (Addition and Renovation of Academic Building South)	3767 Camino de la Cumbre	357	55	3	65.9	10.9	65.9	10.9	56.9	1.9	62.9	7.9	65.9	10.9
	3852 Camino de Solana	299	57	8	62.5	5.5	62.5	5.5	53.5	0.0	59.5	2.5	62.5	5.5
Phase 3C (Disney Pavilion)	3767 Camino de la Cumbre	444	55	3	64.0	9.0	64.0	9.0	55.0	0.0	61.0	6.0	64.0	9.0
	3767 Camino de la Cumbre	409	55	3	64.7	9.7	64.7	9.7	55.7	0.7	61.7	6.7	64.7	9.7
Phase 3D (Lower School Renovations)	3931 Camino de la Cumbre	251	55	3	64.0	9.0	**Renovation Only**						64.0	9.0
	3943 Camino de la Cumbre	245	55	3	64.2	9.2							64.2	9.2
	3954 Camino de la Cumbre	218	55	3	65.2	10.2							65.2	10.2
	3957 Camino de la Cumbre	338	55	3	61.4	6.4							61.4	6.4

[a] *All noise levels represent conditions at the property line closest to the project site. All receptors were analyzed for each phase, but only receptors in which noise levels exceeded the +5 dBA threshold are presented. All other receptors are would not exceed the 5 dBA significance threshold. A complete analysis is presented in Appendix J*

[b] *The ambient noise level is based on the average L_{eq} during construction hours (i.e., 7:00 A.M. to 5:00 P.M.) obtained from a noise measurement taken at 3931 Camino de la Cumbre. This noise measurement was assumed to be representative of other residences located along Camino de la Cumbre.*

[c] *The ambient noise level is based on the average L_{eq} during construction hours (i.e., 7:00 A.M. to 5:00 P.M.) obtained from a noise measurement taken at 3852 Camino de Solana. This noise measurement was assumed to be representative of other residences located along Camino de Solana.*

[d] *The ambient noise level is based on the average L_{eq} during construction hours (i.e., 7:00 A.M. to 5:00 P.M.) obtained from a noise measurement taken near the boundary of the project site and Stansbury Avenue.*

Table IV.I-15 (Continued)

Construction-Period Noise Impacts by Construction Phase and Receptor Location with Mitigation

					Demolition		Grading/Excavation		Foundations		Structural		Finishing/Renovation	
Construction Phase	Representative Receptor Locations	Distance to Receptor (ft.)	Daytime Ambient Sound Level (dBA)	Mitigation (dBA) [f]	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient	dBA (L_{eq})	Increase over Ambient

[e] *Ambient noise levels are based on presumed ambient noise levels for residential areas pursuant to the city of Los Angeles Noise Regulation. LAMC Section 111.03.*

[f] *Mitigation assumes a 3-dBA reduction for residential grade mufflers and a 5-dBA reduction for a temporary construction sound wall for a total of 8-dBA. Even with the implementation of the temporary sound wall, some receptors may have a direct line of sight to the project and only a 3-dBA reduction was considered in the analysis.*

Source: PCR Services Corporation, 2006

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. TRANSPORTATION AND CIRCULATION

This section of the EIR provides an analysis of potential impacts associated with traffic, parking and access and is based on the Traffic Impact Study for Proposed Buckley School Campus Enhancement Plan (Traffic Study), prepared by Crain & Associates, dated March 2006, and included as Appendix L. The Los Angeles Department of Transportation (LADOT) reviewed the Traffic Study and approved its content prior to circulation of this EIR.

1. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Local Street System

The project site is located in the southern portion of the San Fernando Valley within the City of Los Angeles. Streets and freeways within the project vicinity are under the jurisdictions of the City of Los Angeles and the California Department of Transportation (Caltrans). The project site is well served by a grid of arterial streets. Surface street access within the project vicinity is provided primarily by the following streets: Ventura Boulevard, Valley Vista Boulevard, Van Nuys Boulevard, Beverly Glen Boulevard, Stansbury Avenue, Camino de la Cumbre, Hazeltine Avenue, Woodman Avenue, and Benedict Canyon Drive. A description of these streets is provided below.

Ventura Boulevard, located approximately 0.5 mile north of the project site, is designated as a major highway. This east-west roadway is generally 80 feet in width and provides two to three through lanes and left-turn channelization in each direction. The average daily traffic volume on Ventura Boulevard is approximately 50,000 vehicles per day (VPD). This daily volume includes a significant amount of regional traffic traveling through the study area on Ventura Boulevard to avoid congestion on the nearby 101 Freeway. Within the project vicinity, traffic signals exist on Ventura Boulevard at its intersection with Beverly Glen Boulevard, Van Nuys Boulevard, Hazeltine Avenue, and Woodman Avenue.

Valley Vista Boulevard is designated as an east-west designated secondary highway extending from Ventura Boulevard to Sepulveda Boulevard and a collector street west of the San Diego Freeway. Near the project site, this roadway is generally 40 feet in width and provides one lane in each direction. The daily traffic volume on this roadway is approximately 4,500 VPD east and west of Stansbury Avenue.

Van Nuys Boulevard, located west of the project site, is a north-south major highway north of Ventura Boulevard with two lanes in each direction and left-turn channelization. South of Ventura Boulevard, Van Nuys Boulevard is designated as a secondary highway that terminates at Valley Vista Boulevard.

Beverly Glen Boulevard is a north-south secondary and scenic highway that extends over the Santa Monica Mountains from Ventura Boulevard in Sherman Oaks to Pico Boulevard in West Los Angeles. Beverly Glen Boulevard also connects to Mulholland Drive, an east-west scenic highway that travels across the Santa Monica Mountains. Beverly Glen Boulevard provides one lane of traffic in each direction in the project vicinity.

Camino de la Cumbre is a narrow, winding local street that forms the immediate western boundary of the project site. This north-south street extends southerly from the intersection of Greenleaf Street and Stansbury Avenue, and winds its way upward to serve a residential hillside area. Secondary access to The Buckley School is also provided on from this street. A turn restriction posted on Valley Vista Boulevard prohibits westbound vehicles on Valley Vista Boulevard from turning left onto Camino de la Cumbre from 7 A.M. to 9 A.M., except during weekends.

Stansbury Avenue is designated as a north-south collector street between Ventura Boulevard and Valley Vista Boulevard, and a local street south of Valley Vista Boulevard. South of Ventura Boulevard, the roadway width is 36 to 40 feet with one lane of traffic in each direction. Stop signs control traffic on Stansbury Avenue at its intersection with Ventura Boulevard and Valley Vista Boulevard. The average daily traffic volumes on Stansbury Avenue are approximately 2,500 VPD north of Valley Vista Boulevard and 3,500 VPD south of Valley Vista Boulevard. Primary access to the project site is provided at the southern terminus of Stansbury Avenue.

Hazeltine Avenue is a north-south secondary highway from Ventura Boulevard to Covello Street and a local street from Ventura Boulevard to Davana Road. North of Ventura Boulevard, this street generally provides two lanes in each direction with left- and right-turn channelizations at major intersections. This roadway is approximately 65 feet wide just north of Ventura Boulevard. To the south, Hazeltine Avenue provides one lane each way and includes residential permit parking restrictions.

Woodman Avenue is a north-south major highway north of Ventura Boulevard and a local street from Ventura Boulevard to Valley Vista Boulevard. South of Ventura Boulevard, this street generally provides one lane in each direction with left turn channelization at its intersection with Ventura Boulevard.

Benedict Canyon Drive is a short north-south collector street, extending from south of Ventura Boulevard from Woodman Avenue to Valley Vista Boulevard, and provides one lane in each direction.

(2) Regional Transportation System

Regional access within the project vicinity is provided by the San Diego (I-405) and Ventura (US-101) Freeways. The San Diego Freeway (I-405) is a north-south oriented freeway located approximately 2 miles west of the project site. This freeway typically provides four mainline travel lanes and one high-occupancy vehicle (HOV) lane per direction, although additional auxiliary lanes are present in the project area between some sets of on- and off-ramps. The San Diego Freeway provides a west side alternative route across the Santa Monica Mountains and interchanges with the Ventura Freeway (US-101) northwest of the project site. Northbound on- and off-ramps are available on Sepulveda Boulevard south of Ventura Boulevard. Additionally, northbound and southbound on-ramps on Ventura Boulevard are also available west of Sepulveda Boulevard. Further south, southbound on-and off-ramps are provided on Sepulveda Boulevard and on Fiume Street just west of Sepulveda Boulevard, respectively. Based on the most current Caltrans 2004 data available, traffic volumes along the San Diego Freeway segment between Mulholland Drive and the Ventura Freeway interchange are approximately 282,000 VPD with peak-hour volumes of approximately 17,600 vehicles per hour (VPH).

The Ventura Freeway (US-101) is the primary east-west regional freeway in the San Fernando Valley. This freeway, which is located less than one mile north of the project site, provides a contiguous route from beyond Ventura County to the Hollywood Freeway, where it diverges and continues eastbound as State Highway 134 and southbound as US-101. Five travel lanes in each direction are provided along the freeway segment in the study area. Average daily traffic volumes on the Ventura Freeway segment between Van Nuys Boulevard and the San Diego Freeway interchange are approximately 310,000 VPD with peak-hour volumes of approximately 20,500 VPH. Full sets of freeway ramps are located at Van Nuys Boulevard and Woodman Avenue. These generally are the freeway access locations that are the most used by regional traffic accessing The Buckley School.

(3) Public Transit and School Transit

The Los Angeles County Metropolitan Transportation Authority (MTA) operates several bus routes that serve the project area. Current regional transit information available through

MTA indicates that three bus routes provide service within somewhat reasonable walking distance (approximately one mile) of The Buckley School campus: Metro Rapid Route 750, Metro Route 150-240, and Metro Route 158. These routes are available for use by students or employees traveling to and from the project site.

Several transfer opportunities are available from these three routes. When such transfer opportunities are considered, much of the Los Angeles metropolitan area can be accessed via public transportation to and from the project site. However, due to the absence of bus stops closer than those on Ventura Boulevard and the absence of sidewalks on some of the adjacent streets, public transit is not widely used to access the project site. Currently, The Buckley School contracts with an independent school bus service provider to provide pick-up point service to and from the campus. Eight bus routes with one bus per route are provided, which serve the following areas: (1) Pacific Palisades/Brentwood/Bel Air Estates/Sherman Oaks; (2) Los Angeles/Beverly Hills; (3) Coldwater Canyon/Summit/Deep Canyon; (4) Westwood/Beverly Glen; (5) Los Angeles/Hancock Park; (6) Studio City; (7) Woodland Hills/Tarzana/Encino; and (8) Calabasas/Northridge. Six buses seat approximately 32 students each and two buses seat approximately 48 students each. Approximately 116 students were enrolled in the bus program for the 2005 – 2006 school year. In addition, approximately 300 day passes were sold to students for the buses throughout this year. The bus program experiences a somewhat higher ridership in the morning than in the afternoon, due to student participation in after-school extracurricular activities. To prevent on-campus extracurricular activities from becoming an impediment to the bus program enrollment, "late bus" service is also provided to accommodate students who remain on campus for such activities. This "late bus" provides service Monday through Thursday at 5:30 P.M. for Middle and Upper School students. Friday bus departures operate one hour earlier, similar to student class instruction hours.

(4) Access and Queuing

Two driveways currently provide direct access to The Buckley School. The main entrance/exit driveway is located at the southern terminus of Stansbury Avenue, south of Valley Vista Boulevard. A secondary driveway, located on Camino de la Cumbre, provides gated access for minimal School personnel use during the day, and serves as an exit for some faculty, staff, and other vehicles after school hours and when the main entrance/exit is closed.

Due to inadequate queuing area on site at some times during student drop-off and pick-up, vehicles queue along Stansbury Avenue and wait to enter the driveway of the School. To expedite morning and afternoon arrivals and departures, parking attendants and security personnel on The Buckley School campus and on Stansbury Avenue direct traffic flow into and out of the site at the Stansbury Avenue gate during the A.M. and P.M. peak hours. Staff members also help load and unload students during peak periods to improve the efficiency of the drop-off area and to reduce vehicle queues on Stansbury Avenue.

(5) Parking

Approximately 214 marked parking spaces are available on site for student carpools, faculty and staff, and visitors to the School. The School has leased an additional 100 parking spaces at the Sherman Oaks Fashion Square parking lot, located at the southwest corner of Riverside Drive and Woodman Avenue, approximately one mile north of campus. Students who park in this lot are required to have registered permission with the School and are shuttled to campus via a shuttle bus operated by the School's contracted bus service provider. The shuttle is provided within approximately 20-minute intervals to coincide with peak arrival and departure periods. A "good neighbor" policy has been adopted by the School, which prohibits on-street parking on neighboring streets by students or faculty. Students who are found to be parking in the neighborhood are subject to detention and/or suspension of driving privileges.

b. Analysis of Existing Traffic Conditions

(1) Study Intersections

As recommended by LADOT, an analysis of current traffic conditions was conducted at the following ten study intersections in the project vicinity:

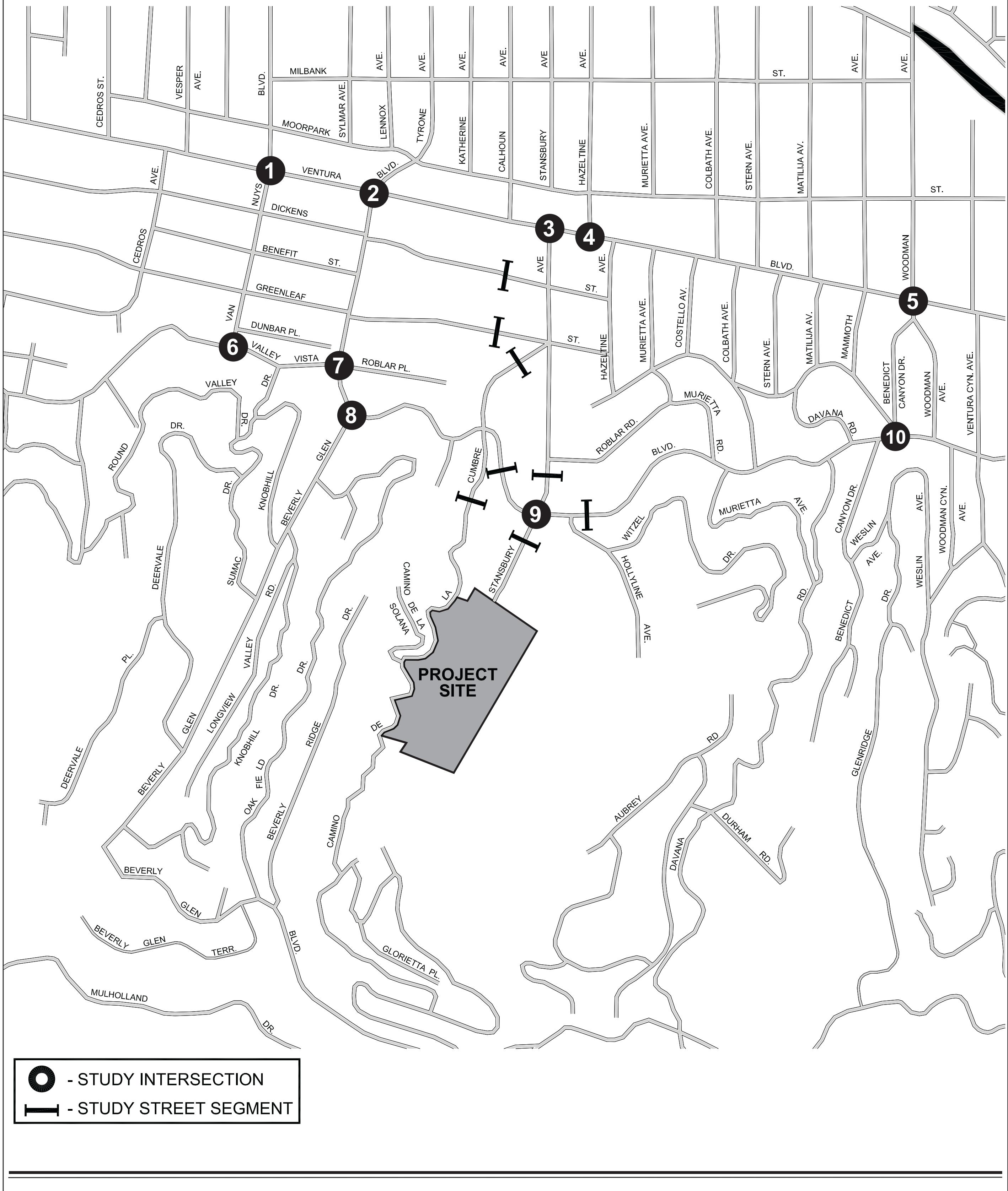
1. Ventura Boulevard and Van Nuys Boulevard
2. Ventura Boulevard and Beverly Glen Boulevard/Tyrone Avenue
3. Ventura Boulevard and Stansbury Avenue
4. Ventura Boulevard and Hazeltine Avenue
5. Ventura Boulevard and Woodman Avenue
6. Valley Vista Boulevard and Van Nuys Boulevard
7. Valley Vista Boulevard/Roblar Place and Beverly Glen Boulevard
8. Valley Vista Boulevard (south) and Beverly Glen Boulevard
9. Valley Vista Boulevard and Stansbury Avenue
10. Valley Vista Boulevard and Benedict Canyon Drive

The locations of these study intersections are shown in Figure IV.J-1 on page 338. Intersection Numbers 3, 6 and 8 above currently operate as two-way stop-controlled intersections while intersection Number 9 operates as an all-way stop-controlled intersection. To evaluate existing traffic conditions, traffic counts were conducted in October 2004 for each of the ten study intersections while school was in full session during a typical school week. These weekday counts were collected manually during the A.M. peak period (7:00 A.M. to 9:00 A.M.), the School P.M. peak period (2:00 P.M. to 4:00 P.M.) and the P.M. peak period for commuter traffic (4:00 P.M. to 6:00 P.M.). Traffic counts were collected by counting the number of vehicles crossing each of the study intersections, while noting the number of vehicles making each possible turning movement. The peak-hour traffic volume for each study intersection was then determined for analysis purposes by finding the four highest consecutive 15-minute volumes for all traffic movements combined. This method provides a "worst case" scenario as it calculates the peak hour for each intersection independent of all other intersections. In addition, for purposes of this analysis, a growth factor of two percent compounded annually was applied to these October 2004 counts to reflect existing (2006) peak-hour traffic volumes per standard LADOT methodology.

Existing and future operations at each study intersection were analyzed in the Traffic Study based on procedures outlined in Circular Number 212 of the Transportation Research Board. In its discussion of Critical Movement Analysis (CMA) for signalized intersections, procedures have been developed for determining operating characteristics of an intersection in terms of the "Level of Service" (LOS) provided for different levels of traffic volume and other variables, such as the number of signal phases. The term LOS describes the quality of traffic flow. LOS A to C operate quite well. LOS D is recognized as the satisfactory level of service in the City of Los Angeles. LOS E represents volumes at or near the capacity of the highway, which might result in stoppages of momentary duration and fairly unstable flow. LOS F occurs when a facility is overloaded and is characterized by stop-and-go traffic with stoppages of long duration.

A determination of the LOS at each of the study intersections was obtained by identifying the CMA value at the study intersection. The CMA values were calculated by adding together the critical movement volumes obtained through the traffic counts and then dividing that summation by the appropriate capacity value for the type of signal control present.[152] The values indicated in Table IV.J-1 on page 339 were used to determine the applicable LOS for signalized intersections. In addition, a capacity of 1,000 VPH and 1,200 VPH was utilized for

[152] *"Capacity" represents the maximum total hourly movement volume of vehicles in the critical lanes that has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of Level of Service E, as indicated in Table IV.J-1. A capacity of 1,000 VPH and 1,200 VPH was utilized for all-way (i.e., intersection 9) and two-way (i.e., intersection Nos. 3, 6, and 7) stop-sign controlled intersections, respectively.*



Source: Crain & Associates, 2006

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Figure IV.J.1
Study Intersections

Table IV.J-1

Critical Movement Volume Ranges [a]
for Determining Levels of Service

LOS	Maximum Sum of Critical Volumes (VPH) 2 Phases	3 Phases	4+ Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	N/A	N/A	N/A

N/A = Not Applicable

[a] *For planning applications only (i.e., not appropriate for operations and design applications).*

Source: Crain & Associates, March 2006.

all-way and two-way stop-sign controlled intersections (i.e., intersection Nos. 3, 6, 8 and 9). The resulting CMA values were then compared with the range of CMA values and corresponding LOS identified in Table IV.J-2 on page 340. The CMA values and corresponding LOS for existing (2006) A.M., School P.M., and commuter P.M. peak-hour conditions at each of the study intersections are summarized in Table IV.J-3 on page 341.

As shown in Table IV.J-3 on page 341, five study intersections operate at adverse conditions (LOS E or F) during either one of the peak hours. Specifically, the intersection of Ventura Boulevard and Van Nuys Boulevard operates at LOS E during the School P.M. peak hour and LOS F during the A.M. and commuter P.M. peak hours. The intersection of Ventura Boulevard and Stansbury Avenue operates at LOS F during the A.M. peak hour and LOS E during the commuter P.M. peak hour. The intersection of Valley Vista Boulevard/Roblar Place and Beverly Glen Boulevard operates at LOS E during the A.M. peak hour. The intersection of Valley Vista (South) and Beverly Glen Boulevard operates at LOS F during the School and commuter P.M. peak hours. In addition, the intersection of Valley Vista Boulevard and Stansbury Avenue operates at LOS E during the A.M. peak hour. It should be noted that all traffic generated by the current enrollment at the School is reflected in the existing base data information.

(2) Residential Street Segments

In order to address project impacts on the residential streets in the project vicinity, twenty-four hour traffic counts were conducted at the following eight street segments in October 2004 to determine the amount of traffic utilizing each segment.

Table IV.J-2

Level of Service as a Function of CMA Values

LOS	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.600
B	Same as above.	0.601–0.700
C	Light congestion; occasional backups on critical approaches.	0.701–0.800
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	0.801–0.900
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	0.901–1.000
F	Forced flow with stoppages of long duration.	> 1.000

Source: Crain & Associates, March 2006.

1. Stansbury Avenue, north of Valley Vista Boulevard
2. Stansbury Avenue, south of Valley Vista Boulevard
3. Valley Vista Boulevard, east of Stansbury Avenue
4. Valley Vista Boulevard, west of Stansbury Avenue
5. Greenleaf Street, west of Stansbury Avenue
6. Dickens Street, west of Stansbury Avenue
7. Camino de la Cumbre, west of Stansbury Avenue
8. Camino de la Cumbre, south of Valley Vista Boulevard

With the exception of the street segment on Stansbury Avenue, south of Valley Vista Boulevard, the counts at these locations were increased by 2 percent per year (compounded annually) to reflect existing 2006 counts, which are shown in Table IV.J-4 on page 342. No growth factor was applied to the traffic volume on Stansbury Avenue, south of Valley Vista Boulevard as this segment is not a through street, and therefore, not expected to experience an increase in traffic volume due to through traffic. As shown in Table IV.J-4, average daily traffic (ADT) volumes at these street segments range from 977 to 4,609 vehicles.

(3) School Peak Hours and Existing Average Vehicle Ridership

To determine the School peak traffic hours, twenty-four hour traffic counts were also collected at the two existing driveway locations on Stansbury Avenue and Camino de la Cumbre.

Table IV.J-3

CMA and LOS Summary Existing (2006) Intersection Traffic Conditions

No.	Intersection	A.M. Peak Hour CMA	A.M. Peak Hour LOS	School P.M. Peak Hour CMA	School P.M. Peak Hour LOS	Commuter P.M. Peak Hour CMA	Commuter P.M. Peak Hour LOS
1.	Ventura Blvd. & Van Nuys Blvd.	1.004	F	0.968	E	1.064	F
2.	Ventura Blvd. & Beverly Glen Blvd./Tyrone Ave.	0.634	B	0.765	C	0.815	D
3.	Ventura Blvd. & Stansbury Ave.	1.072	F	0.868	D	0.940	E
4.	Ventura Blvd. & Hazeltine Ave.	0.717	C	0.611	B	0.656	B
5.	Ventura Blvd. & Woodman Ave.	0.785	C	0.735	C	0.839	D
6.	Valley Vista Blvd. & Van Nuys Blvd.	0.611	B	0.438	A	0.517	A
7.	Valley Vista Blvd./Roblar Pl. & Beverly Glen Blvd.	0.920	E	0.625	B	0.641	B
8.	Valley Vista Blvd. (South) & Beverly Glen Blvd.	0.877	D	1.339	F	1.390	F
9.	Valley Vista Blvd. & Stansbury Ave.	0.954	E	0.482	A	0.479	A
10.	Valley Vista Blvd. & Benedict Canyon Dr.	0.301	A	0.234	A	0.281	A

Source: Crain & Associates, March 2006.

These counts included vehicles exiting and entering the School for a three-day average period during normal School operating hours. A concurrent count of student-operated vehicles was also conducted at the off-site Sherman Oaks Fashion Square parking lot. These off-site student trips were added to the on-site traffic in order to determine the actual School peak hours. The results of the analysis indicate that the School's A.M. peak hour occurs from 7:45 A.M. to 8:45 A.M., the School's P.M. peak hour occurs from 3:00 P.M. to 4:00 P.M., and the roadway P.M. peak hour for commuters occurs from 4:15 P.M. to 5:15 P.M.

Based on the observed traffic data, a total of 686 vehicle trips, consisting of 380 inbound and 306 outbound vehicle trips, were observed at both driveways during the A.M. peak hour. In

Table IV.J-4

Residential Street Segments—Existing (2006) ADT

No.	Street Segment	Existing ADT
1.	Stansbury Ave. north of Valley Vista Blvd.	3,427
2.	Stansbury Ave. south of Valley Vista Blvd.	2,366
3.	Valley Vista Blvd. east of Stansbury Ave.	4,110
4.	Valley Vista Blvd. west of Stansbury Ave.	4,609
5.	Greenleaf St. west of Stansbury Ave.	1,742
6.	Dickens St. west of Stansbury Ave.	3,527
7.	Camino de la Cumbre west of Stansbury Ave.	1,189
8.	Camino de la Cumbre south of Valley Vista Blvd.	977

Source: Crain & Associates, March 2006.

addition, based on 658 passengers observed within 380 vehicles, the School is currently achieving a 1.73 AVR during the A.M. peak hour.

c. Regulatory Framework

(1) Congestion Management Program

The 2002 Congestion Management Program (CMP) is a state-mandated program enacted by the state legislature to address the increasing concern that urban congestion is affecting the economic vitality of the state and diminishing the quality of life in some communities. The CMP provides the analytical basis for transportation decisions through the State Transportation Improvement Process. A countywide approach has been established by the MTA, the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County.

New projects within the City of Los Angeles must comply with the CMP for Los Angeles County. The CMP monitors traffic conditions on the designated transportation network, performance measures to evaluate current and future system performance, promotion of alternative transportation methods, analysis of the impact of land use decisions on the transportation network, and mitigation to reduce impacts on the network. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan. The Transportation Impact Analysis (TIA) Guidelines outlined in the 2004

CMP for Los Angeles County require that, when an EIR is prepared for a project, traffic and transit analyses shall be conducted for select regional facilities based on the quantity of project traffic expected to utilize these facilities. The CMP guidelines for determining the study area of the analysis for CMP arterial monitoring intersections and for freeway monitoring locations are:

- All CMP arterial monitoring intersections, including monitored on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the A.M. or P.M. weekday peak hours of adjacent street traffic; and

- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the A.M. or P.M. weekday peak hours.

The intersections of Ventura Boulevard/Woodman Avenue, located one mile northeast of the project site, and Ventura Boulevard/Sepulveda Boulevard, located two miles northwest of the project site, are designated CMP monitoring intersections within the project vicinity.

(2) Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan

The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan (Community Plan) was adopted in 1988 and last amended in 1998 to guide development in order to create a healthful and pleasant environment. The Community Plan includes goals, objectives, and policies pertaining to transportation issues. Specific transportation-related policies that are applicable to the project are:

- *Policy 11-1.1* Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., car pools, vanpools, buses, flex time, bicycles, and walking etc.)

- *Policy 11-1.3* Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.

- *Policy 13-1.1* Maintain a satisfactory LOS for streets and highways that should not exceed LOS “D” for Major Highways, Secondary Highways, and Collector Streets. If existing levels of service are LOS “E” or LOS “F” on a portion of a highway or collector street, then the level of service for future growth should be maintained at LOS “E”.

- *Policy 13-1.4* New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.

- *Policy 13-2.1* No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.

For an analysis of the project's consistency with other policies of the Community Plan, please refer to Section IV.H, Land Use, of this EIR.

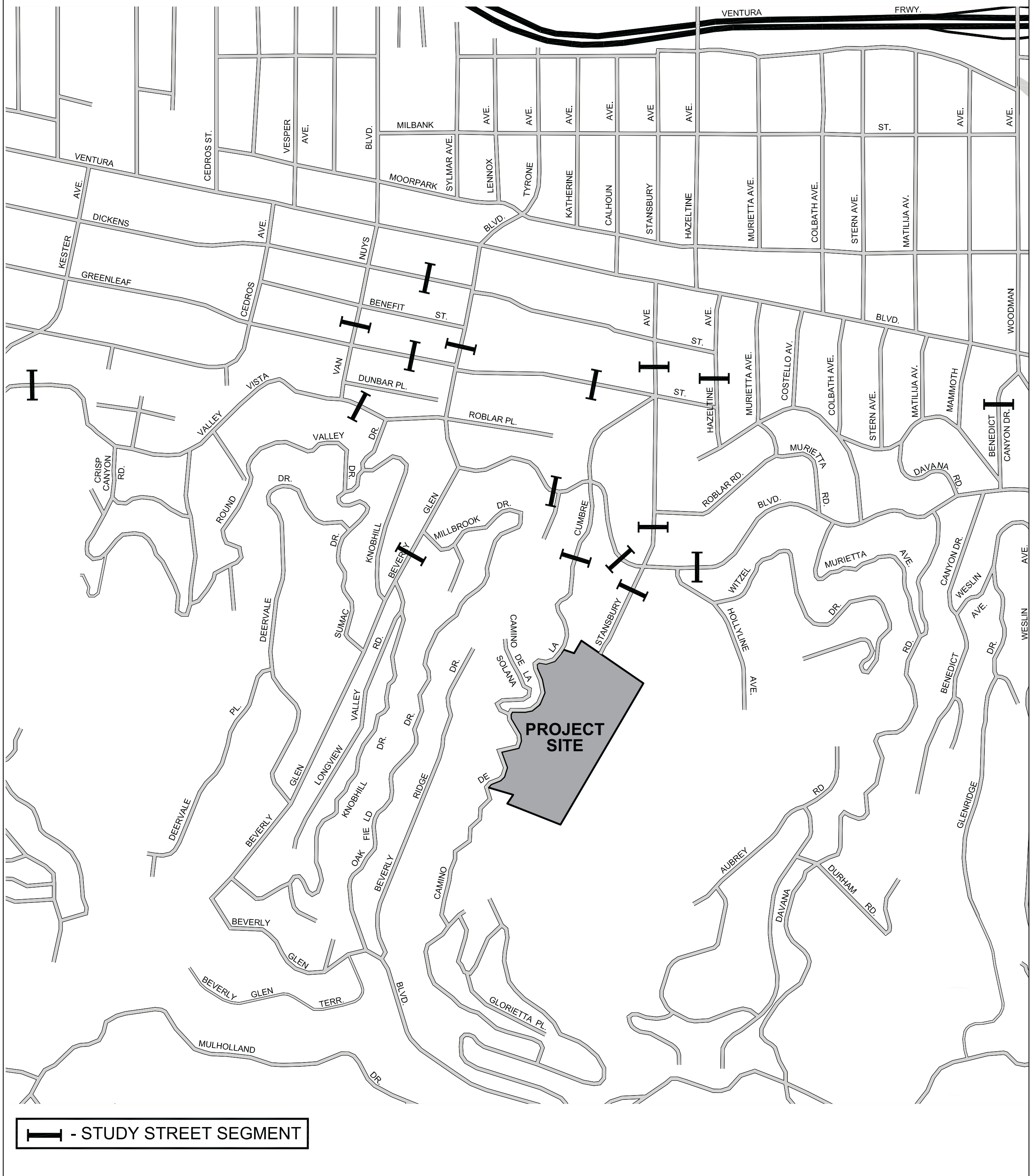
2. ENVIRONMENTAL IMPACTS

a. Methodology

(1) Construction Traffic

To evaluate potential impacts associated with construction of the proposed project, seventeen street segments, as shown in Figure IV.J-2 on page 345 and listed below, were selected for construction-related traffic analysis. These street segments were identified as those that would be most affected by construction-related traffic:

1. Dickens Street between Van Nuys Boulevard and Beverly Glen Boulevard
2. Greenleaf Street between Van Nuys Boulevard and Beverly Glen Boulevard
3. Greenleaf Street, west of Stansbury Avenue
4. Valley Vista Boulevard, east of Kester Avenue
5. Valley Vista Boulevard, east of Van Nuys Boulevard
6. Valley Vista Boulevard, west of Camino de la Cumbre
7. Valley Vista Boulevard, west of Stansbury Avenue
8. Valley Vista Boulevard, east of Stansbury Avenue
9. Van Nuys Boulevard between Benefit Street and Greenleaf Street
10. Beverly Glen Boulevard, between Benefit Street and Greenleaf Street
11. Beverly Glen Boulevard, south of Millbrook Drive



Source: Crain & Associates, 2006

Figure IV.J.2
Construction Study Street Segment

12. Camino de la Cumbre, south of Valley Vista Boulevard

13. Stansbury Avenue between Dickens Street and Greenleaf Street

14. Stansbury Avenue, north of Valley Vista Boulevard

15. Stansbury Avenue, south of Valley Vista Boulevard

16. Hazeltine Avenue between Dickens Street and Greenleaf Street

17. Benedict Canyon Drive between Ventura Boulevard and Valley Vista Boulevard

Weekday and Saturday traffic volumes on these 17 street segments were obtained from 24-hour traffic counts conducted in 2004 and 2005. Similar to the analysis of intersection impacts, a growth factor of 2.0 percent per year (compounded annually) was applied to the counts for all but one street segment to estimate existing (2006) traffic volumes. No growth factor was applied to the traffic volume on Stansbury Avenue south of Valley Vista Boulevard, as this segment is not a through street and therefore, not expected to experience an increase in traffic volume due to through traffic. For each year of construction, the existing 2006 traffic volumes were further growth factored by 2.0 percent per year. Estimated weekday and Saturday daily trips from related projects were then added to the growth-factored volumes to create the baseline traffic volumes for these street segments.

Next, the types and number of trips associated with construction of the project (i.e., construction truck trips, worker trips, etc.) were identified. These trips were calculated based on detailed construction activity information provided for each phase of construction activity. These trips were then assigned and distributed to the 17 segments, and added to the baseline traffic volumes on the segments. The resulting traffic volumes with the project were then compared with the baseline traffic volumes to determine if the project would exceed the threshold for a significant construction impact.

(2) Intersections

As discussed above in the analysis of existing conditions, the analysis of existing and future operations at each study intersection was based on the procedures outlined in Circular Number 212 of the Transportation Research Board. As discussed in greater detail below, traffic impacts were evaluated by: (1) determining the trip generation for the project based on the proposed student enrollment increase; (2) assigning these project trips to the roadway network; (3) analyzing the future (2014) "Without Project" traffic conditions (existing conditions plus ambient growth and growth from related projects); (4) evaluating the service condition of the roadways with the addition of project trips; and (5) comparing future (2014) "Without Project" conditions with the future (2014) "With Project" conditions to obtain the change in service levels caused by the project. These changes were compared to the thresholds of significance set forth by LADOT to determine whether significant impacts would occur. Where significant impacts were identified, mitigation measures were identified to reduce such impacts to less than significant levels.

(a) Project Trip Generation

Traffic volumes to be generated by the project were computed using trip generation rates derived from data collected in October 2004 at the existing School site and procedures approved by LADOT. The data counted the number of vehicles observed to enter/exit all access points (e.g., driveways) for the School and the off-site Fashion Square lot during the peak hours and were used to formulate the weekday A.M., School P.M., and commuter P.M. peak-hour trip-generation rates for The Buckley School. These rates were compared with private school trip generation rates documented in the Institute of Transportation Engineers (ITE) *Trip Generation, 7th Edition* (2003). A comparison of the two sets of rates is shown in Table IV.J-5 on page 348. As indicated in this table, the site specific trip generation values for the School are generally higher than the reported national ITE trip-generation values for the A.M. peak hour, School P.M. peak hour, and commuter P.M. peak hour. Therefore, to provide a worst-case analysis, the School's trip-generation rates were utilized to calculate the amount of new traffic to be generated by the project's proposed 80 student maximum enrollment.

(b) Trip Distribution and Assignment

Once the number of trips generated by the project was calculated, the geographic distribution of project-generated trips was determined. The primary factor affecting this trip distribution was the relative distribution of the student population. Thus, a review and analysis of the existing student population by zip code was completed and used to determine the likely student distribution for the proposed enrollment increase. Using the directional distribution that was identified, project traffic volumes were assigned to the specific routes expected to be used to access the site during the A.M., School P.M. and commuter P.M. peak hours.

(c) Future (2014) "Without Project" and "With Project" Traffic Conditions

In order to determine how project trips would affect the roadway system, future (2014) baseline traffic volumes due to ambient growth and undeveloped, related projects were estimated. Year 2014 was selected as the year for analysis as this is the year when the project's maximum 80-student increase would occur. To develop the future (2014) "Without Project" traffic conditions, a growth factor of 2 percent compounded annually was applied to the existing (2006) traffic volumes. Trips attributable to 29 related projects (i.e., future foreseeable projects

Table IV.J-5

Project Trip-Generation Rates

ITE Private School (K–12) per Student—Land Use 536	
Daily:	T = 2.48 (S)
A.M. Peak Hour:	T = 0.79 (S); I/B = 61%, O/B = 39%
P.M. Peak Hour of Generator:	T = 0.55 (S); I/B = 41%, O/B = 59%
P.M. Peak Hour of Adjacent Street:	T = 0.17 (S); I/B = 43%, O/B = 57%
Buckley School (K–12) per Student*	
Daily:	T = 4.11 (S)
A.M. Peak Hour:	T = 0.94 (S); I/B = 56%, O/B = 44%
School P.M. Peak Hour:	T = 0.59 (S); I/B = 47%, O/B = 53%
Commuter P.M. Peak Hour:	T = 0.31 (S); I/B = 36%, O/B = 64%

Where:
T = trip ends   I/B = inbound percentages
S = student   O/B = outbound percentages

* *Rates shown are based on empirical data per discussion with LADOT*

Source: Institute of Transportation Engineers, Trip Generation, 7th Edition, 2003.

that are undeveloped and unoccupied as of the time of the baseline counts), as identified in Section III of this EIR, were then added to the baseline traffic volumes to form the basis for the future (2014) "Without Project" traffic conditions in the study area. The future (2014) "With Project" conditions were developed by adding the project trips to the future (2014) "Without Project" conditions. For a conservative analysis, although numerous future highway improvements have been proposed in the project vicinity, the roadway system was considered to remain unchanged from the existing conditions (i.e., without future roadway improvements).

(3) Residential Street Segments

The residential street segments analysis analyzes the effects of project traffic on the eight residential street segments listed in Table IV.J-4. Within the project vicinity, the portion of Stansbury Avenue between Valley Vista and the project site is a City-designated residential street that is located on a route used for School access. Thus, this residential street segment has been included in the analysis of the project's potential impacts on residential streets. Collector streets (i.e., Stansbury Avenue north of Valley Vista Boulevard, and Benedict Canyon Drive south of Ventura Boulevard) and secondary highways (i.e., Valley Vista Boulevard and Beverly Glen Boulevard) generally do not require a local residential street impact analysis by LADOT because of their roadway classification. Nevertheless, to address neighborhood concerns, the seven additional street segments were included in the analysis of residential street impacts. Coy Drive was not included in the residential street impact analysis due to its distance from the project site and the fact that it does not provide reasonably direct site access due to its circuitous alignment. Therefore, any project-related traffic that might use Coy Drive would be negligible.

Similar to the analysis for intersections, existing (2006) traffic volumes for all but one of the street segments were increased by a growth factor of 2 percent per year to develop the future (2014) Without Project traffic levels. No growth factor was applied to the Stansbury Avenue south of Valley Vista Boulevard as this segment is not a through street and therefore, not expected to experience an increase in traffic volume due to through traffic. The future (2014) Without Project traffic levels were then compared to the future (2014) With Project baseline traffic levels. The difference was then compared to significance thresholds to determine whether a significant impact would occur on the residential street segments.

(4) Regional Transportation System

The regional transportation system analysis identifies whether additional analysis of freeway or intersection locations would be required pursuant to CMP thresholds that establish whether such analyses are needed. If such analyses are needed, the project's traffic volumes are compared to the significance threshold to determine whether the project would result in a significant impact on CMP facilities.

(5) Public Transit and School Transit

The methodology for the analysis of public and school transit impacts includes a review of how the project would increase ridership. Based on this review, a determination is made as to whether the existing public and school transit would be affected and whether sufficient capacity exists to serve the project's increase in ridership.

(6) Access and Queuing

The methodology for the analysis of site and queuing impacts includes a review of the proposed access and circulation scheme. Based on this review, a determination is made as to whether the entry/exit operations at the project site would be adequate and whether the significance thresholds would be exceeded. Also provided is a determination of whether the project would substantially increase the potential for pedestrian/vehicle and/or bicycle/vehicle conflicts.

(7) Parking

The analysis of parking impacts identifies the demand for parking upon completion of the project. That demand is compared to the available parking spaces to determine whether the project provides a sufficient supply of parking to meet its needs. Also included is a determination of whether the project meets the LAMC parking requirements.

(8) Pedestrian/Bicycle Safety

The methodology for the analysis of pedestrian/bicycle safety impacts includes a review of the project's access and circulation scheme and a determination of whether the project would substantially increase the potential for pedestrian/vehicle and/or bicycle/vehicle conflicts.

(9) Consistency with Plans

This analysis includes a review of relevant transportation regulations, plans, and policies and a determination of whether the project would conflict with these regulations, plans, and policies.

b. Thresholds of Significance

(1) Construction Traffic

LADOT recently formulated criteria regarding the analysis of construction-related traffic impacts. These criteria are as follows:

A quantitative analysis of construction-related traffic impacts attributable to a project shall be required, provided all of the following criteria have been determined to be applicable:

- That hillside residential streets proximate to the construction site are expected to provide primary access for construction-related traffic;
- That the duration of the construction period, including site preparation, clearance and/or grading is expected to exceed 12 months;
- That an average of 120 or more construction-related trips per day (in Passenger Car Equivalents or PCE) are expected to be generated at the site driveway(s) or on the street(s) abutting the site, prior to any mitigation; and

The calculation of construction-related traffic impacts shall be made on segments of those hillside residential streets proximate to the site that are expected to provide primary access for construction-related traffic. A hillside residential street shall be deemed significantly impacted by construction-related traffic, based on the following increase in projected average daily traffic (ADT) volumes:

Projected Average Daily Traffic with Construction-Related Traffic (Final ADT in PCE)	Construction-Related Traffic Increase in ADT
0 to 999	Average of 120 or more trips of final ADT
1,000 to 1,999	Average of 12 percent or more of final ADT
2,000 to 2,999	Average of 10 percent or more of final ADT
3,000 or more	Average of 8 percent or more of final ADT

(2) Intersections

The following thresholds of significance will be applied to the proposed project's impacts on signalized intersections as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on intersection capacity if the project traffic causes an increase in the volume-to-capacity (V/C) ratio on the intersection operating condition after the addition of project traffic of one of the following:

V/C ratio increase ≥ 0.040 if final LOS* is C

V/C ratio increase ≥ 0.020 if final LOS* is D

V/C ratio increase ≥ 0.010 if final LOS* is E or F

**Final LOS is defined as projected future conditions including project, ambient, and related projects but without project traffic mitigation.*

(3) Residential Street Segments

The following thresholds of significance are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a proposed project would normally have a significant neighborhood intrusion impact if project traffic increases the average daily traffic (ADT) volume on a local residential street in an amount equal to or greater than the following:

ADT increase ≥ 20 trips if final ADT* < 1,000
ADT increase ≥ 12 percent if final ADT* ≥ 1,000 and < 2,000
ADT increase ≥ 10 percent if final ADT* ≥ 2,000 and < 3,000
ADT increase ≥ 8 percent if final ADT* ≥ 3,000

**"Final ADT" is defined as total projected future daily volume including project, ambient, and related project growth.*

LADOT has defined significance levels for project traffic impacts on local residential streets in their Traffic Study Policy and Procedures, revised March 2002. Accordingly, based on the above guidelines and the LADOT-established criteria, a local residential street would be deemed to have a significant impact based on an increase in the projected average daily traffic (ADT) volumes as follows:

Final ADT	Project-Related Increase in ADT
0 to 999	16 percent or more of final ADT
1,000 or more	12 percent or more of final ADT
2,000 or more	10 percent or more of final ADT
3,000 or more	8 percent or more of final ADT

(4) Regional Transportation System

The following thresholds of significance will be applied to the proposed project as set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant regional capacity impact if project traffic causes an increase in the demand-to-capacity (D/C) ratio on a CMP regulated segment or on- or off-ramp of 2 percent or more capacity (D/C increase ≥ 0.02), which causes or worsens LOS F conditions (D/C > 1.00).

The CMP requires that all freeway segments where a completed project adds 150 or more trips in any direction during the peak hours be analyzed. An analysis is also required at all CMP intersections where the completed project will add 50 or more trips during the peak hour. For the purposes of CMP and based on the guidelines above, a significant traffic impact occurs when the proposed project increases traffic demand on a CMP facility by 2 percent of capacity, causing or worsening LOS F.

(5) Public Transit

For purposes of this analysis, impacts on public transportation would be considered significant if the project were to add substantial new ridership to bus lines operating in excess of their capacity or if the project would conflict with adopted policies, plans, or programs supporting alternative transportation.

(6) Access and Queuing

The following threshold of significance is set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant project access impact if the intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hour, under cumulative plus project conditions.

However, in view of the sensitivity of the neighborhood to on-street queuing on Stansbury Avenue, the guideline above does not adequately address project driveway access and queuing. Neither LADOT nor the "L.A. CEQA Thresholds Guide" has established a threshold of significance regarding a project's potential impact on driveway access and on-street queuing at access driveways. Therefore, for purposes of this analysis, impacts to access and queuing associated with project operation would be considered significant if the project resulted in on-street queuing that regularly interfered with traffic flow more than as compared with existing circumstances.

In addition, neither LADOT nor the "L.A. CEQA Thresholds Guide" has established a threshold of significance regarding a project's potential impact on emergency access. Therefore, for purposes of this analysis, project impacts to emergency vehicle access associated with project operation would be considered significant if the project resulted in regular additional interference with access by emergency service providers as compared with existing circumstances.

(7) Parking

The following threshold of significance is set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that a project would normally have a significant impact on parking if the project provides less parking than needed as determined through an analysis of demand from the project. Therefore, for purposes of this analysis, impacts to parking would be considered significant if the project's parking demand would exceed the parking supply.

(8) Pedestrian/Bicycle Safety

The following factors are set forth in the City of Los Angeles' "L.A. CEQA Thresholds Guide," which states that the determination of significance shall be on a case-by-case basis, considering the following factors:

- The amount of pedestrian activity at project access points.

- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facility the project driveway(s) crosses and the level of utilization
- The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle or vehicle/vehicle impacts.

Based on these factors, impacts to pedestrians and bicycles would be considered significant if the project resulted in a regular increase in pedestrian/vehicle or bicycle/vehicle conflict due to project street parking and traffic as compared with existing conditions.

(9) Consistency with Plans

The City of Los Angeles' "L.A. CEQA Thresholds Guide" does not specify a threshold of significance for a project's consistency with relevant transportation plans and policies. Therefore, for purposes of this analysis, significant impacts related to consistency with plans would result if the project would conflict with the implementation of adopted transportation programs, plans, and policies.

c. Project Features

(1) Construction

As described in Section II, Project Description, of the EIR, construction for the proposed project would be completed in three basic phases over the course of three and a half years, spread out over an 80-month period beginning in May 2009 and ending in December 2015.[153] Prior to the start of each construction phase, minor preparatory work (i.e., not involving the use of heavy–duty equipment or vehicles) may occur for approximately two months, from March to May for each phase. However, only the periods of intensive construction, during which heavy-duty equipment would be used, are reflected in this construction traffic analyses since few workers would be on-site during the two month preparatory period. Phase 1 is expected to begin in May 2009 for a duration of approximately 12 months. Phase 2 could begin in May 2010 for a duration of approximately 18 months, immediately following the end of Phase 1. Phase 2 could

[153] *Full student enrollment is expected to be achieved by the 2014–2015 school year. However, construction of all of the campus enhancement facilities would take longer to complete, hence the one-year difference in operational (2014) and construction (2015) time frames reflected in the impact analysis.*

also begin as late as May 2011, one year after the completion of Phase 1. For a conservative analysis, it is assumed that Phase 2 would begin in May 2010 with an 18-month break before the start of Phase 3. Finally, Phase 3 is expected begin in May 2013 and would occur over the course of a two-year time period. The start of the construction phases are timed to coincide with the end of each school year. Table IV.J-6 on page 356 includes an overview of the anticipated construction schedule by phase. It should be noted that the above construction schedule is tentative, and that changes may occur due to unforeseen circumstances, in which case the above phasing may need to be adjusted.

Construction would occur Mondays through Fridays from 7:00 A.M. to 5:00 P.M. and Saturdays from 8:00 A.M. to 5:00 P.M. In addition, the following project features related to construction are proposed as part of the project and supplement the Project Description:

- Construction-related vehicles shall not be permitted to arrive at the project site prior to 6:30 A.M. on weekday and 7:30 A.M. on Saturday, except for those vehicles used by persons engaged in supervisory, management or inspection duties.
- All medium and heavy duty trucks shall access the project site via Stansbury Avenue or Valley Vista Boulevard west of Stansbury Avenue. Such vehicles may use Valley Vista Boulevard east of Stansbury Avenue only in cases of emergency.
- No construction-related vehicles shall be allowed on Camino de la Cumbre, except in cases of emergency.
- All construction-related vehicles shall be parked on site or in off-site parking lots, pursuant to a Temporary Parking Plan. On-street parking of construction-related vehicles shall be prohibited on nearby local residential streets in the area.
- Construction trucks, materials and equipment shall not be staged on local or collector streets, Valley Vista Boulevard, Van Nuys Boulevard, or Beverly Glen Boulevard south of Ventura Boulevard.
- A "hot line" shall be established by The Buckley School to receive construction-related inquiries.
- A construction relations officer shall be designated by The Buckley School to serve as a liaison with the surrounding community and general public, and to respond to their construction-related inquiries.
- All construction-related vehicles shall be parked on site to the extent feasible.

Table IV.J-6

Project Construction Phases

Phase	Project Building	Approximate Time Period
1	New Library and Technology Center	May ’09 through Apr. ‘10
2	New Middle and Upper School Main Academic Building and Parking Facility	May ’10 through Oct. ‘11
3A	New Academic Building West	May ’13 through Apr. ‘14
3B	Addition and Renovation of Existing Academic Building South	May ’14 through Apr. ‘15
3C	New Outdoor Aquatic Center and Disney Pavilion Renovation	May ’14 through Dec. ‘15
3D	Lower School Renovation	May ’13 through Sep. ’13 or May ’14 through Sep. ‘14

Source: Crain & Associates, March 2006.

- Temporary Parking Plan—Temporary off-site parking shall be provided at a designated off-site location(s) such as the Sherman Oaks Fashion square parking lot or the Sunkist Building lot whenever there is insufficient space for construction workers and/or faculty/staff members to park on site. The School shall implement a parking plan involving the temporary off-site location(s) and shuttle service to accommodate either the construction workers and/or faculty/staff members.

- School Visitor Parking—The School shall make interim operational changes and reassign existing parking areas to accommodate visitor parking needs, as necessary. The School shall manage its visitation schedule during class hours so that parking demand by visitors does not occur during the student arrival and departure periods.

- Parking for After-School Activities—Parking demand associated with after-school activities shall be addressed as follows to prevent the use of street parking during construction:

  - The School shall use the athletic field and other open areas on campus, to the extent feasible, for overflow parking during its more popular non-field athletic games, with team practices that rely on the field scheduled around these game dates.

  - The School shall schedule its more heavily attended interscholastic field games at “away” sites, such as the opposing team’s home field or a nearby neutral site, whenever feasible and when on-site parking is inadequate to accommodate all users.

  - The School shall manage its calendar for after-school activities to minimize overlap of popular athletic games.

- Parking for Annually Scheduled School Functions – Parking demand associated with most active annually scheduled School functions shall be addressed as follows:

  – Construction Rescheduling and Off-Site Parking—No construction-related activity shall be scheduled during the annual Buckley School Fair or the Commencement proceedings. These two scheduled functions shall require the use of on-site parking in combination with an off-site parking program and shuttle service as is currently done.

  – Added Parking Management—A parking management program shall be undertaken for functions that are anticipated to use the combination of on-site and off-site parking in order to better manage the level of on-site parking usage that is otherwise anticipated. The parking management program will appeal to the need for families to go above and beyond their regular rideshare behavior to reduce parking demand and understand that on-street parking is prohibited on nearby streets.

(2) Operation

As discussed in Section II, Project Description of the Draft EIR, as part of the Campus Enhancement Plan, primary access to the site would continue to be provided by the main entrance at the southern terminus of Stansbury Avenue. The project would reconfigure a large portion of the existing surface parking area within the northern portion of the site to provide for a new arrival plaza. In addition, the project would include the construction of a new enclosed parking facility within the eastern portion of the campus. Primary access to the School would continue to be provided by the main driveway at the southern terminus of Stansbury Avenue. The project's new configuration would require all vehicles entering the Stansbury Avenue gate to proceed to the new arrival plaza, turn into the visitor parking lot, or enter the lower level of the new enclosed parking facility or continue straight to enter the upper level of the parking facility. Regular student, faculty/staff members, and visitors would not be permitted to travel beyond the northern portion of campus in order to facilitate the separation of pedestrians and vehicle traffic on campus. The gate at Camino de la Cumbre would continue to provide limited access for service vehicles, deliveries, some employees, athletic field access, and emergency access. The existing internal roadway through the campus would be redesigned as a pedestrian walkway only, with the exception of facilitating emergency vehicle access when necessary.

The new enclosed parking facility would include 127 parking spaces on the lower level and 113 parking spaces on the upper level for a total of 240 parking spaces, including standard, compact, and disabled-access spaces. Furthermore, approximately 66 surface parking spaces would remain throughout the campus for disabled-access, maintenance, and service vehicles. This would bring the total on-site parking capacity to approximately 306 spaces and when compared with the existing parking supply of 214 spaces, would increase the on-site parking supply by 43 percent. For the limited events on campus during which the parking demand is expected to exceed the parking supply, "stack parking", valet parking, and other methods would be used to accommodate the demand. With construction of the enclosed parking facility and the new arrival plaza on campus, traffic circulation would be improved on-site and School-related vehicles queuing on the adjacent residential street would be removed. The parking facility would provide increased vehicle queuing space on campus during the peak drop-off and pick-up periods, by utilizing both levels as needed by demand. The arrival plaza would provide the dual flexibility of bus queuing and loading space as well as overflow visitor and delivery parking during the off-peak hours. Parking attendants and security personnel would continue to direct traffic flow and student drop-off/pick-up process at the arrival plaza.

d. Analysis of Project Impacts

(1) Construction

(a) Intersections

As discussed above, construction activities would occur in three phases. Phase 1 would encompass an approximate 12-month time frame beginning in May 2009. Phase 2 would immediately follow in May 2011 and cover a period of approximately 18 months. Phase 3 would be staged over a two-year period beginning in May 2013, where Phase 3A would have a duration of approximately 12 months, after which both Phase 3B and Phase 3C would start. Phase 3B would occur over approximately 12 months, while Phase 3C would take approximately 20 months. The shortest phase, 3D, would overlap either with Phase 3A or 3B and 3C. For purposes of a "worst" case analysis, the overlapping of Phases 3B, 3C and 3D was also assumed. As discussed above, as currently planned, each construction phase would begin with an approximate two month period of minor preparatory work, with more intensive construction activities beginning in approximately May of each phase, coinciding with the end of the school year. Since few workers would be on-site during the two month preparatory period, only the periods of intensive construction, during which heavy-duty equipment would be used, are reflected in this construction traffic analysis. As also discussed above, the above construction schedule is tentative and may change due to unforeseen circumstances, in which case the above phasing may need to be adjusted. During construction, grading would require an estimated 15,674 cubic yards of cut and an estimated 15,674 cubic yards of fill, for a nearly balanced site in terms of earthwork. Some incidental import or export (i.e., less than 1,000 cubic yards) would also be required during Phase 2 and Phase 3.

Construction-related traffic would consist of trips generated by construction workers and truck trips delivering materials to the site and removing debris, soil, and other materials from the site. It is anticipated that construction workers would arrive at the site prior to 7:00 A.M. and leave by 4:00 P.M., without leaving the site throughout the day. In general, construction supervisors/managers would arrive earlier and leave later than construction workers and may make trips to and from the site during the work day. Visitors to the site are estimated to arrive between 8:00 A.M. and 5:00 P.M. Construction truck trips would arrive and depart between 7:00 A.M. and 5:00 P.M. On Saturdays, the initial arrival times to the site would be approximately one hour later. Construction workers and visitors would arrive from all over the Los Angeles region and are thereby, assumed to arrive from all directions. It is likely that most of this traffic would travel to the site via the Ventura (US-101) or San Diego Freeway (I-405).

The location where soil, debris, and other construction materials would be disposed of has not been determined. However, for purpose of this analysis, it is assumed that the Bradley Landfill in Sun Valley would receive these materials. Accordingly, it is assumed that haul trucks would travel north on Stansbury Avenue to Ventura Boulevard; east on Ventura Boulevard to Woodman Avenue; north on Woodman Avenue to the Ventura Freeway; east on the Ventura Freeway to the Hollywood Freeway; and north on the Hollywood Freeway to eventually reach the landfill. A specific staging area for construction has not been identified. However, for purposes of the traffic analysis, it was assumed that construction trucks would stage on Ventura Boulevard, which is frequently used for such purposes.

For purposes of a conservative analysis, it was assumed that all construction workers, supervisory and staff personnel, and site visitors would drive alone to the site and park their vehicles on site. In addition, haul, concrete, delivery and other heavy-duty construction truck trips were converted to passenger car equivalents (PCE) by using a multiplier factor. According to Circular Number 212 of the Transportation Research Board, truck trips would typically be converted using a PCE multiplier of 2.0. However, to ensure a further conservative analysis and to account for the effect of the hillside terrain around the site, a PCE factor of 2.5 was applied to medium duty or lighter delivery trucks, while a PCE factor of 3.0 was applied to heavy-duty delivery/hauling, concrete, bottom dump, and special use trucks.

As discussed in detail in the Traffic Study as provided in Appendix L of this EIR, construction of the project would generate a range of approximately 84 to 416 daily trips, with an average of 176 daily trips. As stated above, all of the construction trips are based on the highest daily construction-related traffic generated per week each month, rather than an average of all of the weeks each month. These trips are also based on a conservative assumption that all construction-related vehicles would park on-site throughout the construction process.

- The daily construction trips for each month of construction were then distributed and assigned to the 17 study segments evaluated, and added to the baseline volumes on those segments. The same amount of construction trips was assumed for both weekday and Saturday conditions. Based on the criteria described above, an impact assessment was made for each construction month for each study segment. This specific data is presented in the Traffic Study presented in Appendix L. The assessment indicates that all significant construction traffic impacts would occur only at the street segment of Stansbury Avenue south of Valley Vista Boulevard.

(b) Parking

All construction-related vehicles would be parked or stored in designated areas on-site to the extent possible. Once completed, the new parking facility, with approximately 240 spaces, would also be available for construction personnel parking. It is also possible that this facility could be in usable condition for construction personnel parking a few months prior to its estimated completion date of January 2011. School faculty/staff members would also park in the facility as much as possible after its completion. However, there is the likelihood that there would be occasions during construction when sufficient space is not available to park all users on-site. On those occasions, the School would implement a parking plan that provides temporary off-site parking for construction workers and, if necessary, faculty/staff and/or students. A shuttle service would be operated between the off-site parking location and the project site. Two possible locations for the off-site parking are the Sherman Oaks Fashion Square parking lot at the southwest corner of Riverside Drive and Woodman Avenue, and the Sunkist building parking lot at the southwest corner of Riverside Drive and Hazeltine Avenue. Both locations are approximately one mile from the project site. Under this parking plan, an adequate parking supply would be available to accommodate all construction- and School-related vehicles without the use of any on-street parking nearby. Therefore, no parking impacts due to construction-related activities are anticipated on the surrounding streets.

The School would also make interim operational changes as necessary to accommodate visitor parking needs. For example, the manner in which parking areas are currently used could be modified or reassigned, and visitor schedules could be revised to minimize overlaps with student drop-off/pick-up periods. Therefore, such interim operational changes, in conjunction with the off-site parking plan, would be expected to result in no parking impacts associated with school-day operations.

Parking demand for after-school athletic events during construction would be addressed through a combination of on-site and off-site parking, as not all of the School's student drop-off/pick-up capacity would be available nor sufficient to accommodate the parking demand of the more popular games. The School would also use its field for overflow stack parking during its more popular non-field athletic games, with team practices that rely on the field scheduled around these game dates. In addition, the School would schedule its more popular interscholastic field games at "away" sites, such as the opposing team's home field or a nearby neutral site, whenever feasible. The School would manage its calendar for after-school activities to minimize overlap of popular athletic games. Furthermore, the new parking facility would become available approximately in the middle of Phase 2, which would enhance the capability to accommodate the parking demand associated with after-school athletic events. With these features of the project construction period, no parking impacts due to School athletic events would be expected to occur.

The parking needs associated with the most active School functions during construction were also evaluated. Prior to the availability of the new parking facility proposed as part of Phase 2, the existing surface lots and field area would still be in place and could be used for organized parking as is done presently. Through implementation of organized parking, which may involve stacked parking, valet parking, or other methods, it is estimated that the campus could accommodate up to approximately 375 parked vehicles in the structure and on surface lots and areas. In addition, the project features outlined above would manage the anticipated parking demand and ensure that sufficient parking is provided on-site or at a designated parking lot off-site to prevent the use nearby street parking when annual School functions are held. Included in these project features is the provision that no construction-related activities are to be scheduled during the annual Buckley School Fair and Commencement proceedings.

Overall, with incorporation of the construction-related project features described previously, construction parking impacts would be less than significant.

(2) Operation

(a) Intersections

The analysis of project traffic impacts on the study intersections is based on a comparison of the baseline future (2014) "Without Project" traffic conditions against the future (2014) "With Project" traffic conditions. As discussed above, the future (2014) "Without Project" takes into account the effects of ambient growth and related projects. Table IV.J-7 on page 362 shows the CMA and LOS of the future (2014) "Without Project" conditions. As shown in this table, traffic conditions are expected to slightly deteriorate at all ten study intersections. Seven intersections would operate at unacceptable levels of service (LOS E or F) during one or more of the peak periods. Figure IV.J-3 through Figure IV.J-5 on pages 363 through 365 shows the future (2014) "Without Project" traffic volumes.

To calculate the incremental vehicle trips that would be generated by the project, the School's trip-generation rates for the A.M. peak-hour, School P.M. peak hour, and commuter P.M. peak-hour were applied to the proposed project's 80-student maximum enrollment increase. Based on these rates, the project would be expected to generate 329 net new daily vehicle trips as shown in Table IV.J-8 on page 366. During the A.M. peak-hour, a net increase of 75 trips (42 inbound and 33 outbound) would occur. During the School P.M. and commuter P.M. peak-hours,

Table IV.J-7

CMA and LOS Summary
Future (2014) Traffic Conditions—Without and With Project

No.	Intersection	Peak Hour	Without Project CMA	Without Project LOS	With Project CMA	With Project LOS	With Project Impact
1.	Ventura Blvd. &	A.M.	1.253	F	1.258	F	0.005
	Van Nuys Blvd.	School P.M.	1.301	F	1.305	F	0.004
		Commuter P.M.	1.412	F	1.414	F	0.002
2.	Ventura Blvd. &	A.M.	0.802	D	0.809	D	0.007
	Beverly Glen Blvd./Tyrone Ave.	School P.M.	0.989	E	0.993	E	0.004
		Commuter P.M.	1.047	F	1.049	F	0.002
3.	Ventura Blvd. &	A.M.	1.311	F	1.336	F	0.025*
	Stansbury Ave.	School P.M.	1.113	F	1.130	F	0.017*
		Commuter P.M.	1.197	F	1.205	F	0.008
4.	Ventura Blvd. &	A.M.	0.899	D	0.901	E	0.002
	Hazeltine Ave.	School P.M.	0.813	D	0.815	D	0.002
		Commuter P.M.	0.865	D	0.866	D	0.001
5.	Ventura Blvd. &	A.M.	0.981	E	0.986	E	0.005
	Woodman Ave.	School P.M.	0.942	E	0.945	E	0.003
		Commuter P.M.	1.068	F	1.070	F	0.002
6.	Valley Vista Blvd. &	A.M.	0.732	C	0.733	C	0.001
	Van Nuys Blvd.	School P.M.	0.538	A	0.539	A	0.001
		Commuter P.M.	0.632	B	0.632	B	0.000
7.	Valley Vista Blvd./Roblar Pl. &	A.M.	1.106	F	1.109	F	0.003
	Beverly Glen Blvd.	School P.M.	0.767	C	0.769	C	0.002
		Commuter P.M.	0.787	C	0.789	C	0.002
8.	Valley Vista Blvd. (South) &	A.M.	1.043	F	1.058	F	0.015*
	Beverly Glen Blvd.	School P.M.	1.595	F	1.605	F	0.010*
		Commuter P.M.	1.655	F	1.661	F	0.006
9.	Valley Vista Blvd. &	A.M.	1.131	F	1.168	F	0.037*
	Stansbury Ave.	School P.M.	0.590	A	0.616	B	0.026
		Commuter P.M.	0.584	A	0.594	A	0.010
10.	Valley Vista Blvd. &	A.M.	0.360	A	0.367	A	0.007
	Benedict Canyon Dr.	School P.M.	0.289	A	0.293	A	0.004
		Commuter P.M.	0.342	A	0.345	A	0.003

* *Denotes significant project traffic impact, prior to implementation of project mitigation*

Note: These CMA values, excerpted from the traffic study prepared by Crain & Associates dated March 2006 (included as Appendix L), differ slightly from the CMA values presented in the Los Angeles Department of Transportation traffic assessment letter dated September 27, 2006 (Appendix L-1). The slight variations are generally attributable to differences in assumptions regarding traffic flow and capacity conditions at the study intersections, which in this case did not result in any different conclusions regarding the study intersections that would experience significant impacts as a result of the project. However, due to these minor differences, the traffic study concluded that three intersections would be significantly impacted during two peak hours (the A.M. peak hour and the School afternoon peak hour), whereas the LADOT traffic assessment letter concluded that those intersections would be significantly impacted only during the A.M. peak hour. Nevertheless, LADOT's traffic assessment letter concluded that the traffic study "adequately describes the project-related impacts of the proposed development," and therefore the Draft EIR incorporates the impact conclusions of the traffic study to provide a more conservative analysis.

Source: Crain & Associates, March 2006.

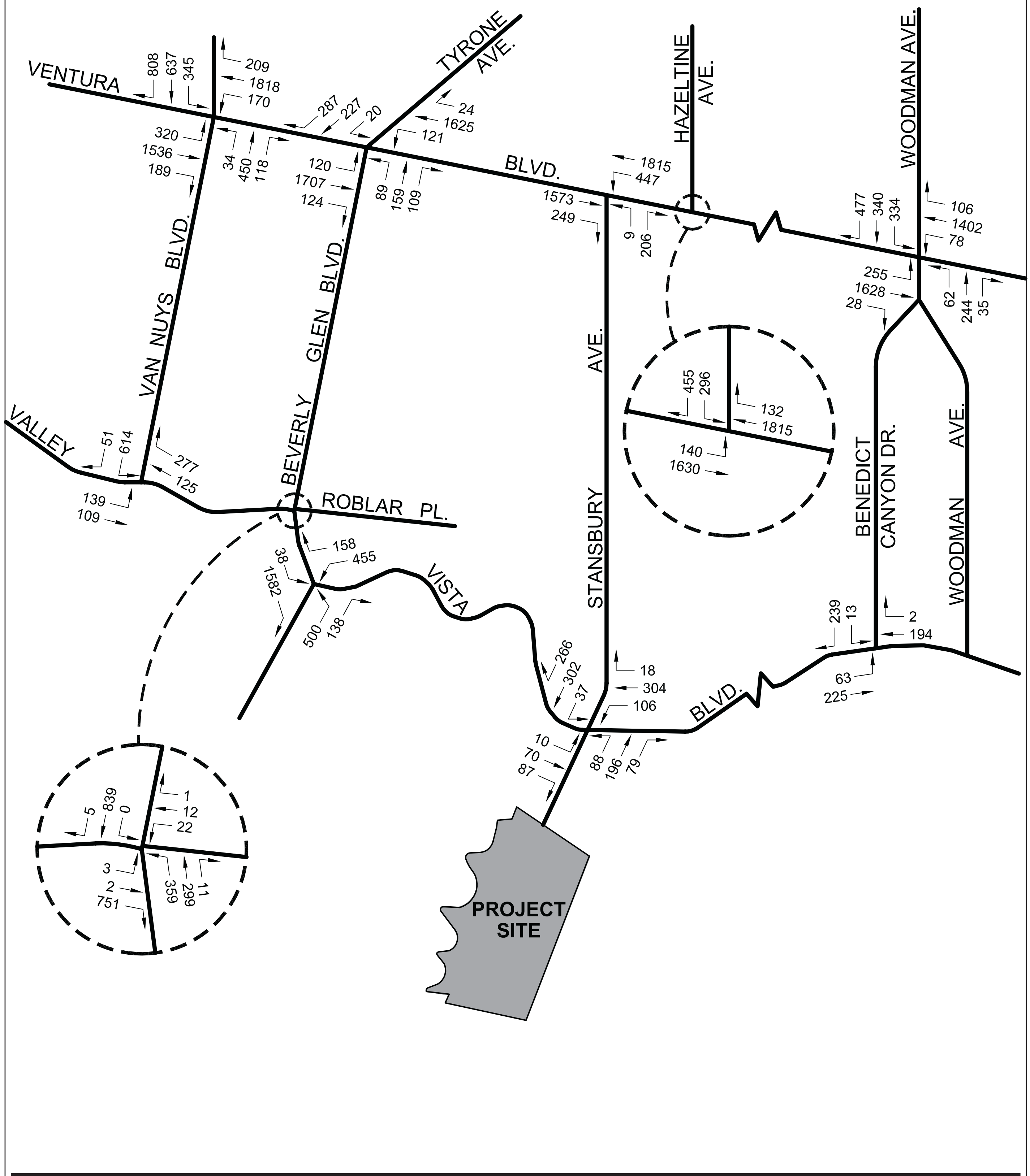
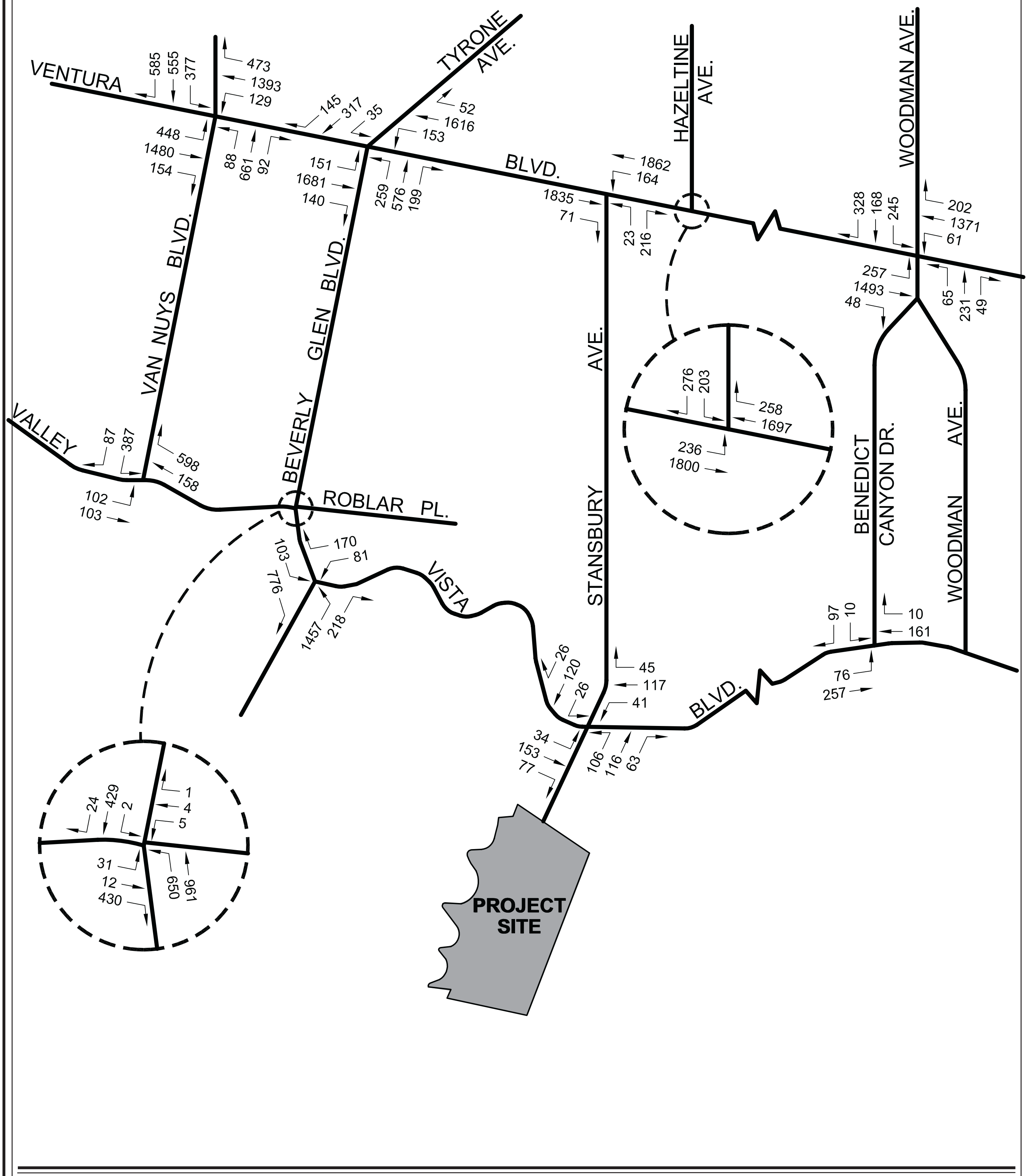
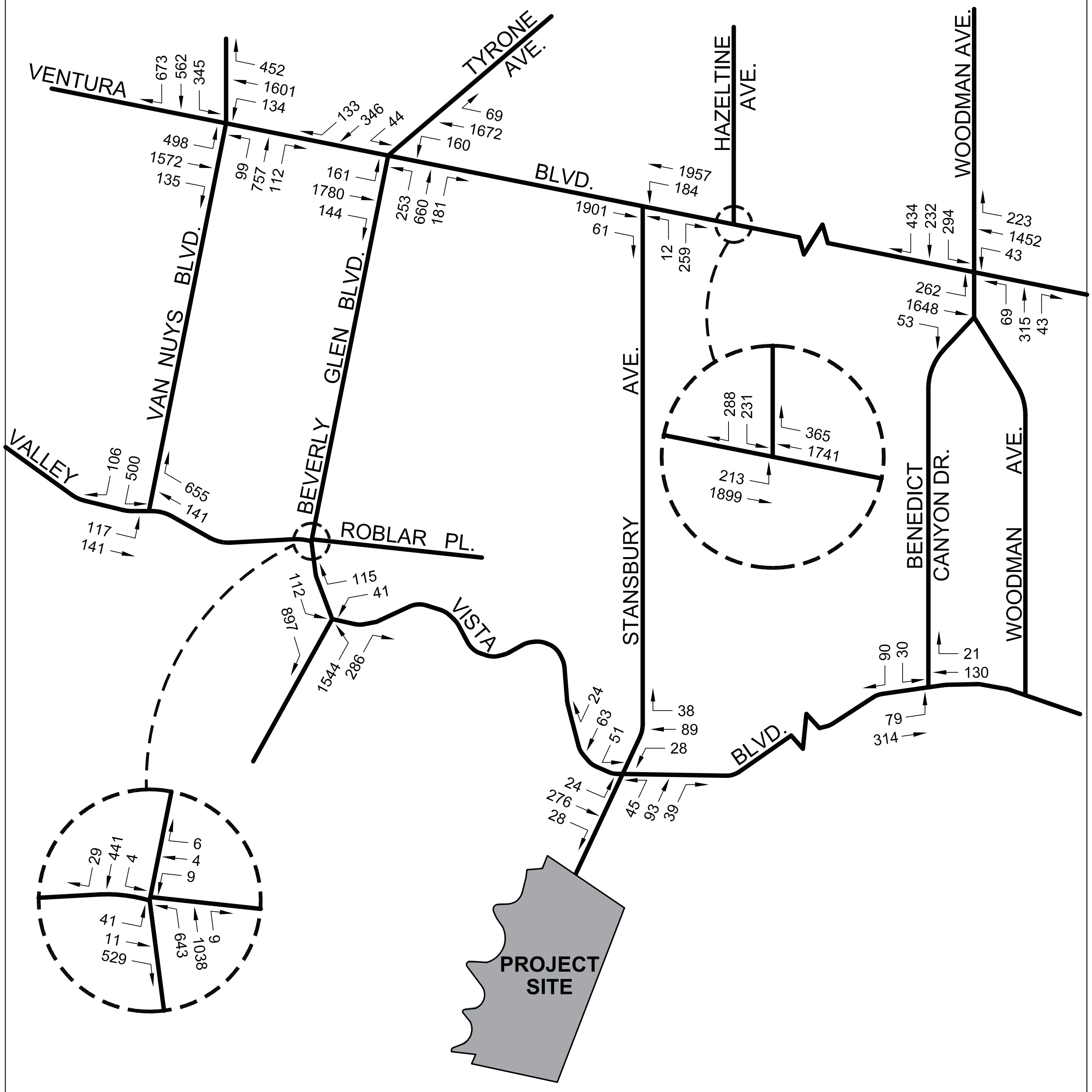


Figure IV.J.3
Future (2014) Without Project Traffic Volumes AM Peak Hour



Source: Crain & Associates, 2006

Figure IV.J.4
Future (2014) Without Project Traffic Volumes School PM Peak Hour



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Not to scale

Figure IV.J.5
Future (2014) Without Project Traffic Volumes Commuter PM Peak Hour

Source: Crain & Associates, 2006

Table IV.J-8

Project Traffic Generation

	A.M. Peak Hour			School P.M. Peak Hour			P.M. Peak Hour		
Daily	**Inbound**	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**	**Inbound**	**Outbound**	**Total**
329	42	33	75	22	25	47	9	16	25

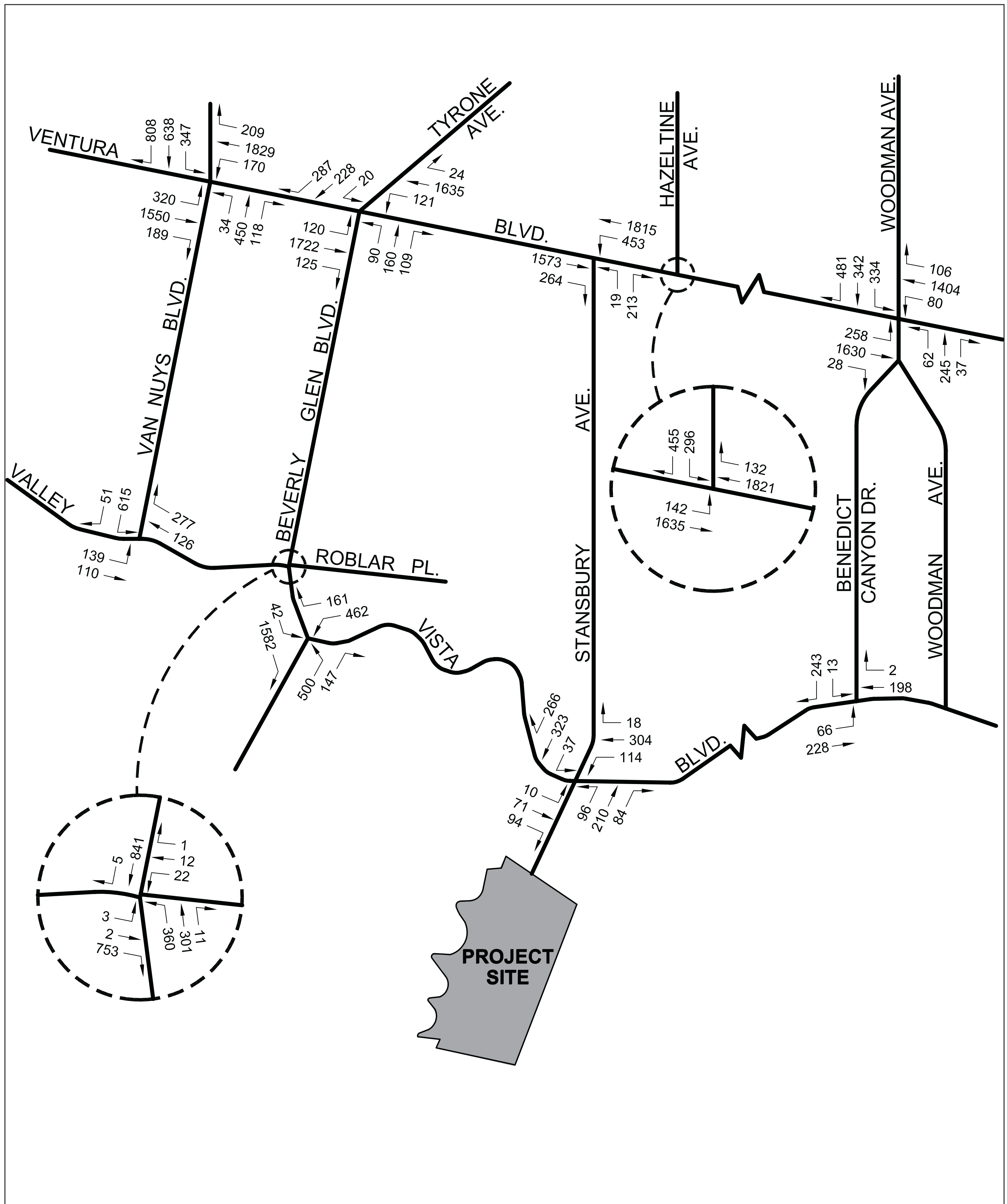
Source: Crain & Associates, March 2006.

a net increase of 47 trips (22 inbound and 25 outbound) and 25 trips (9 inbound and 16 outbound) would occur respectively.

To determine future (2014) "With Project" traffic conditions, the project trips during the peak hours described above were added to those that would occur under the future (2014) "Without Project" conditions. These future "With Project" conditions were then compared with the future "Without Project" conditions to determine the change in the V/C ratio (i.e., the CMA value) resulting from the project. This value was then compared with the threshold above to determine whether any intersections would be significantly impacted. Figure IV.J-6 through Figure IV.J-8 on pages 367 through 369 shows the future (2014) With Project traffic volumes. As shown in Table IV.J-7, while the peak-hour conditions would change only nominally with the project, the project would significantly impact three intersections: (1) Ventura Boulevard and Stansbury Avenue during the A.M. and School P.M. peak hours; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard during the A.M. and School P.M. peak hours; and (3) Valley Vista Boulevard and Stansbury Avenue during the A.M. peak hour. As described below, proposed mitigation measures would reduce these significant intersection impacts to levels that are less than significant.

(b) Residential Street Segments

Similar to the analysis of intersection impacts, the analysis of residential street impacts is based on a comparison of the baseline future (2014) "Without Project" traffic conditions against the future (2014) "With Project" traffic conditions. Table IV.J-9 on page 370 shows the forecasted traffic volumes with and without the project for the future study year 2014. Based on the thresholds provided above, impacts on the residential street segments would be less than significant with the exception of Stansbury Avenue south of Valley Vista Boulevard. As shown in this table, the project would add approximately 293 net daily trips to Stansbury Avenue south of Valley Vista Boulevard and thus, would significantly impact this residential street segment. As discussed below, a mitigation measure is proposed to reduce impacts at this street segment to a level that is less than significant.



Not to scale

Source: Crain & Associates, 2006

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Figure IV.J.6
Future (2014) With Project
Traffic Volumes AM Peak Hour

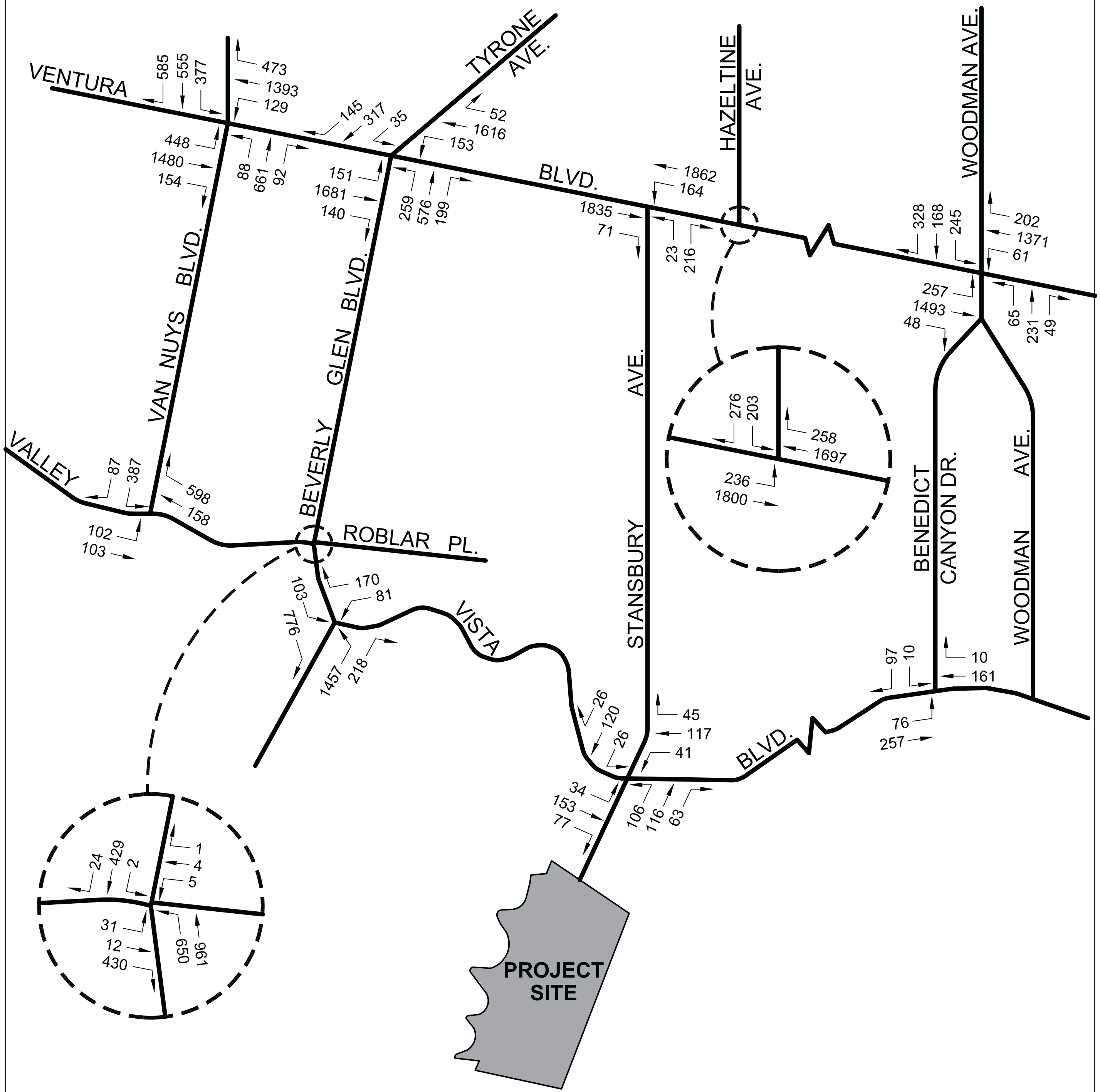

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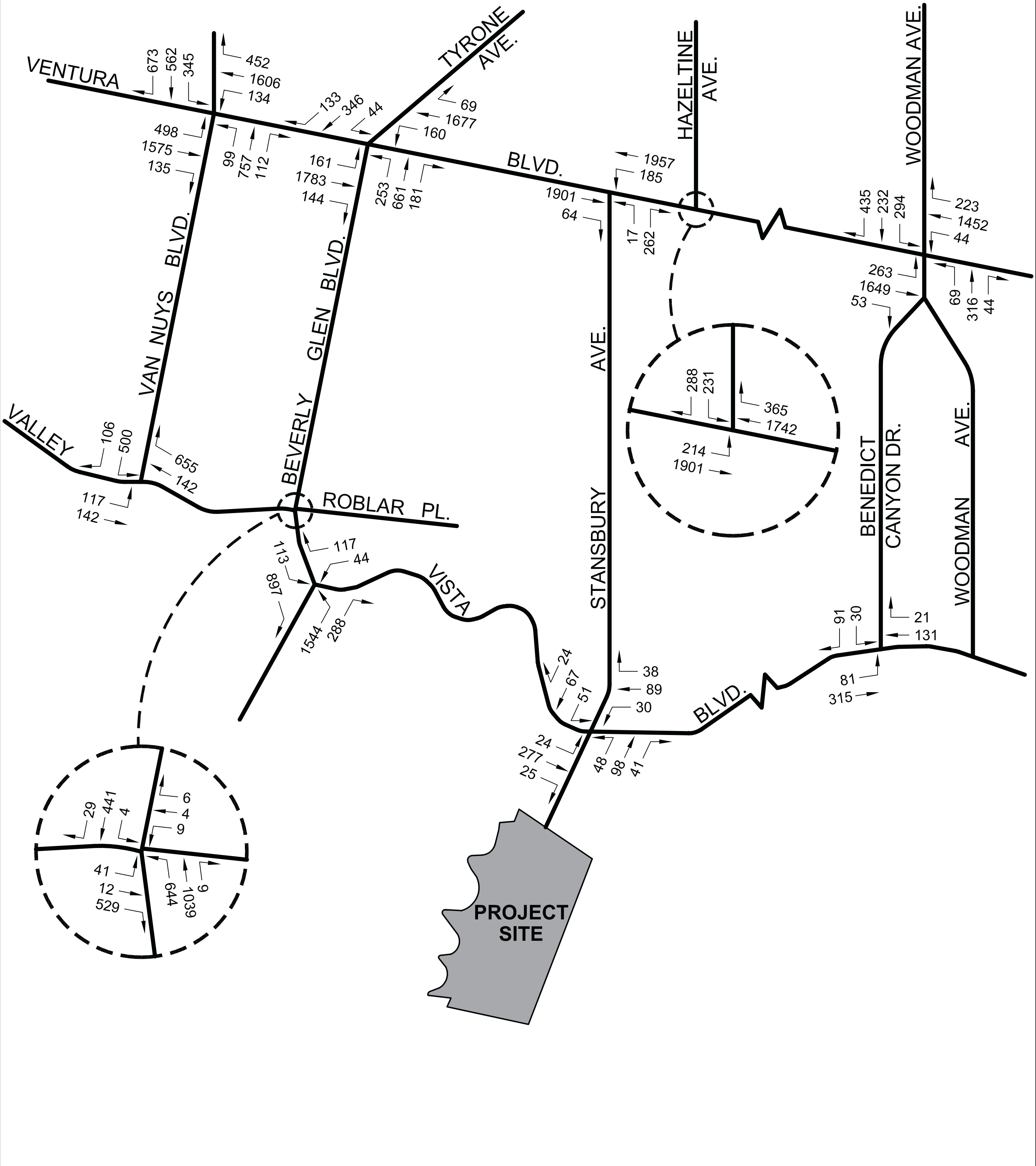
Figure IV.J.7
Future (2014) With Project
Traffic Volumes School PM Peak Hour

Source: Crain & Associates, 2006



Not to scale

Source: Crain & Associates, 2006

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Figure IV.J.8
Future (2014) With Project
Commuter Traffic Volumes PM Peak Hour

Table IV.J-9

Residential Street Traffic Impact Analysis—Future (2014) ADT

No.	Street Segment	Without Project	Project Traffic	With Project	Percent Project Traffic
1.	Stansbury Ave. north of Valley Vista Blvd.	4,253	156	4,409	3.54%
2.	Stansbury Ave. south of Valley Vista Blvd.	2,506	293	2,799	10.47%*
3.	Valley Vista Blvd. east of Stansbury Ave.	5,301	66	5,367	1.23%
4.	Valley Vista Blvd. west of Stansbury Ave.	5,787	80	5,867	1.36%
5.	Greenleaf St. west of Stansbury Ave.	2,041	0	2,041	0%
6.	Dickens St. west of Stansbury Ave.	4,132	0	4,132	0%
7.	Camino de la Cumbre west of Stansbury Ave.	1,393	9	1,402	0.64%
8.	Camino de la Cumbre south of Valley Vista Blvd.	1,145	36	1,181	3.05%

* *Denotes significant project traffic impact, prior to implementation of project mitigation.*

Source: Crain & Associates, March 2006.

(c) Regional Transportation System (CMP Impacts)

As indicated above, the intersections of Ventura Boulevard/Woodman Avenue, located one mile northeast of the project site, and Ventura Boulevard/Sepulveda Boulevard, located two miles northwest of the project site, are designated CMP monitoring intersections within the project vicinity. Based on the traffic study provided in Appendix L of this EIR, the Ventura Boulevard/Woodman Avenue intersection would experience a net increase of 18 trips during the A.M. peak hour, 11 project trips during the School P.M. peak hour, and 6 trips during the commuter P.M. peak hour as a result of the project. For the Ventura Boulevard/Sepulveda

Boulevard intersection, the project would add 25 net new trips during the A.M. peak hour, 15 trips during the School P.M. peak hour, and 8 trips during the commuter P.M. peak hour. Thus, the proposed project would not add 50 or more trips to the two CMP intersections and impacts would be less than significant. No further CMP intersection analysis is necessary.

The CMP also requires that any freeway segment where a project is expected to add 150 or more trips in any direction during the A.M. or P.M. peak hours also be analyzed. As shown in Table IV.J-8 on page 366, the maximum number of trips to be generated for a peak hour would be 42 inbound trips during the A.M. peak hour. Therefore, as the peak-hour trips expected to use the freeway network for project site access are substantially less than the freeway threshold of

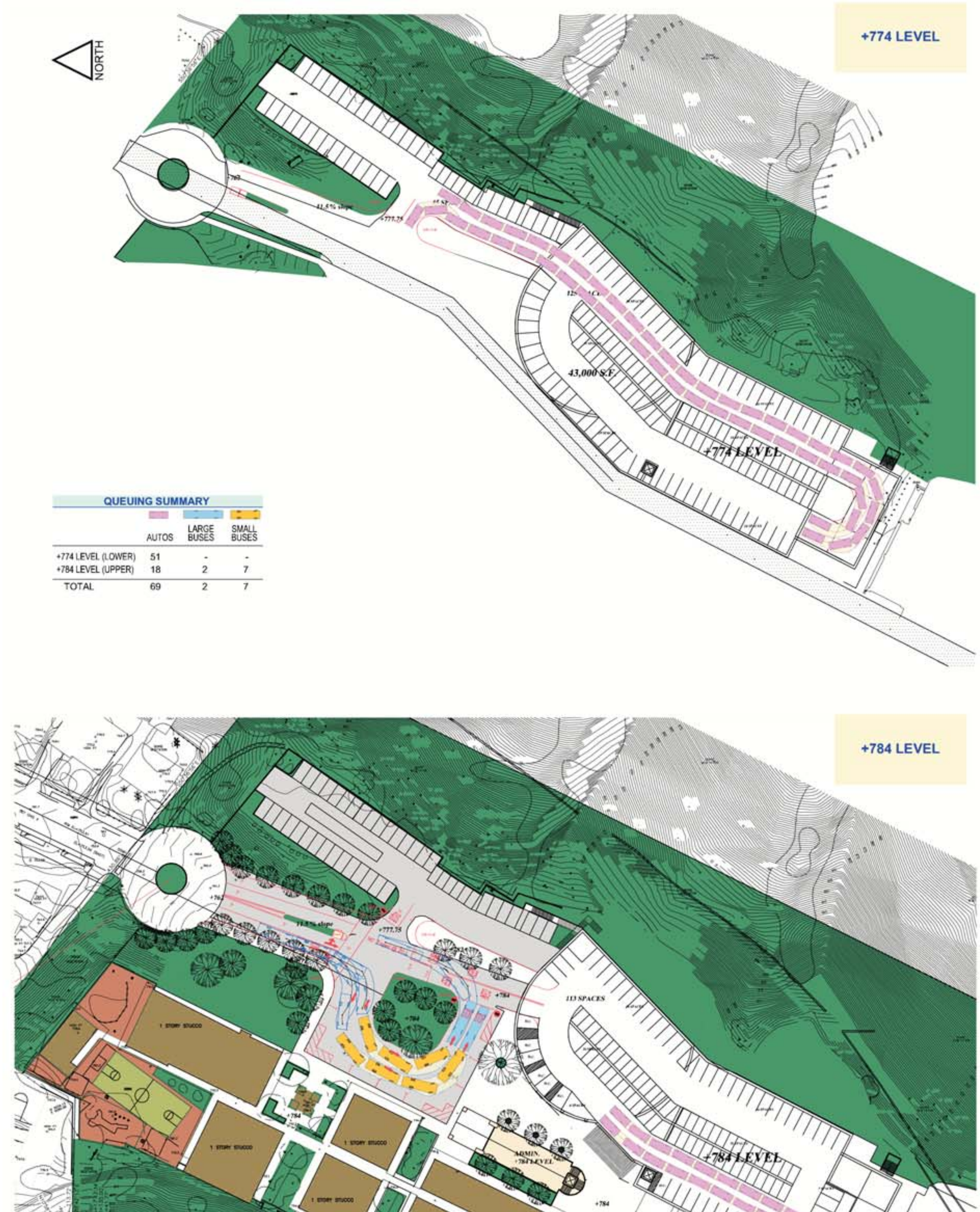
150 directional trips, impacts to the freeways would be less than significant. No further analysis of CMP freeway analysis is necessary.

(d) Public Transit and School Transit

With regard to public transit, due to the absence of bus stops closer than Ventura Boulevard and the existing use of an independent school bus provider to provide a busing program for Buckley students, it is anticipated that the use of the public bus transit systems by the School would continue to be minimal. Any increase in the use of public transit use in the project area resulting from the increased enrollment would be expected to be nominal and would adequately be accommodated by existing public transit buses and routes. Thus, the project would not cause a substantial increase on the ridership of any bus lines operating in excess of their capacity and impacts associated with public transit would be less than significant. In addition, the existing bus program operated by the School, which includes eight buses serving eight different geographic areas, has adequate capacity to accommodate any increased demand for busing generated by the project.

(e) Access and Queuing

Primary access to the School would continue to be provided via the main driveway on Stansbury Avenue. In order to eliminate the off-site vehicle queuing which typically occurs on Stansbury Avenue, the existing front parking lot at the northeastern portion of the site would be redesigned to provide adequate site access and circulation for the visitor parking lot, the enclosed parking facility, and the new arrival plaza. The project's proposed new configuration of circulation space would require all vehicles entering the Stansbury Avenue gate to proceed to the new areas arrival plaza, visitor parking area, or enter the enclosed parking facility. The new parking facility, including its access connection, will provide a queuing capacity for approximately 51 vehicles on the lower level and approximately 18 vehicles on the upper level, for a total of 69 vehicles. Vehicles in queue for peak drop-off or pick-up activities would enter campus via Stansbury Avenue and turn left to enter the lower level of the parking facility, where dual queuing lanes would form and continue to circle up the ramp to the upper level before stopping at the northwest area of the parking facility for supervised loading/unloading activities. After completing the pick-up or drop-off activities, vehicles would exit the upper level of the parking facility without interfering with entering vehicles on the lower level. Figure IV.J-9 on page 372 illustrates the access and circulation scheme proposed for the project. Parking attendants and security personnel would continue to direct traffic flow and student drop-off/pick-up process at the Stansbury Avenue driveway and on site in order to maximize the efficiency of the planned loading area and to eliminate the vehicle queues on Stansbury Avenue.



QUEUING SUMMARY

	AUTOS	LARGE BUSES	SMALL BUSES
+774 LEVEL (LOWER)	51	-	-
+784 LEVEL (UPPER)	18	2	7
TOTAL	69	2	7

PCR

Figure IV.J-9
Proposed Accessing and Queuing Scheme

Source: Crain & Associates, 2006

The new arrival plaza would also serve to maximize the vehicle queuing capacity of the campus by enabling nine buses to stage on site for student loading and unloading but outside the main vehicle circulation and queuing areas. The buses, once loaded, would have priority egress from the site, much as they do now, which would then open the bus staging area to passenger vehicle use during the off-peak period. Under the proposed project, the existing vehicle queuing on Stansbury Avenue would be eliminated. Thus, the project would improve on-site access and circulation, and impacts would be less than significant. Other access and queuing schemes for the proposed project were considered and evaluated during the preliminary design process but were rejected as the currently proposed scheme allows for increased area for vehicular movements, greater queuing capacity, and less removal of on-site parking spaces.

With regard to emergency access, project construction features would be incorporated to ensure adequate emergency access. Specifically, as discussed above, construction vehicles would be prohibited from traveling on Camino de la Cumbre and on Valley Vista Boulevard east of Stansbury Avenue except in cases of emergency. During operation, the project's new arrival plaza and new parking facility would enable vehicular queues associated with the daily student drop-off and pick-up activities to be contained on site, which in turn would facilitate the movement of emergency vehicles in and around the site perimeter. Furthermore, the project's proposed pedestrian walkway, which would be developed in accordance with applicable safety standards set forth in the City Code, would be available for emergency vehicle access if necessary. With the proposed access and circulation scheme, increased parking, and expanded queuing capacity, adequate emergency access would be maintained. Additionally, during emergencies, the School would implement established emergency response and/or evacuation procedures. For emergencies when evacuation of the entire campus is required, emergency evacuation procedures would be undertaken by the School. Emergency team members would be responsible for leading students to the off-campus evacuation site at Van Nuys-Sherman Oaks Park on Huston Street, just west of Hazeltine Avenue and north of Riverside Drive. School faculty and staff would also facilitate the safe crossing of the students at major intersections. Based on the above, the project's impacts on emergency access would be less than significant.

(f) Parking

Vehicle counts were conducted to calculate parking demand at the project site. Based on these counts taken on site at the campus and off-site parking lots, the maximum parking demand for the School would be 246 spaces with the increase in students and staff, which would occur at approximately 3:00 P.M. As analyzed in more detail in the Traffic Study, to provide adequate parking and ensure proper circulation, approximately 10 percent additional spaces should be provided above the 246 spaces demanded, or at least 270 parking spaces to accommodate the increase in students. As described above, a new, two-level parking facility is proposed as part of the project. The parking facility would provide 240 total parking spaces, with 127 spaces on the lower level and 113 spaces on the upper level. In addition, approximately 66 other surface parking spaces would be available throughout the campus for disabled-access and maintenance/service vehicles. Upon project completion, 306 parking spaces would be available on site. In addition, for most large functions or events on campus for which the parking demand is expected to exceed the parking supply, "stack" parking, valet parking, and/or other methods to increase on-site parking capacity would be used to accommodate the demand similar to special event parking programs at other independent schools. Two events, the Annual Fair and the Commencement proceedings, would continue to require supplemental parking off-site with shuttle service to and from the School. It is not anticipated that other School events would require off-site parking. Therefore, the project's parking supply, along with the supplemental off-site parking and shuttle service for two special events, would be sufficient to meet parking demand, and impacts on parking would be less than significant.

As discussed in the Traffic Study presented in Appendix L of this EIR, the parking demand study undertaken for the project determined a daily demand for 270 parking spaces on-site. Based on LAMC parking requirements (i.e., based on the largest assembly use for the facilities shared by the Middle and Upper Schools and one space per classroom for the Lower School), the project would be required to provide a total of 216 parking spaces; however, since this amount is less than the existing CUP parking requirement of 230 spaces, it has not been applied as the project parking requirement. To be further conservative, the Traffic Study evaluated a hypothetical parking demand based on concurrent use of two Upper School assembly spaces (i.e., the existing Disney Pavilion and the proposed multipurpose room), yielding a need for 294 spaces. As stated earlier, approximately 306 parking spaces would be provided on-site, which would provide a surplus beyond the maximum hypothetical parking demand, the actual daily parking demand, as well as the code-required parking supply. Thus, the project's proposed parking supply would be more than adequate.

(g) Pedestrian/Bicycle Safety

The planned pedestrian oriented walkway through the campus would improve on-site safety by separating students, faculty, and staff from most vehicles accessing the site. The pedestrian walkway would be developed in accordance with applicable City requirements, including those for fire safety (e.g., per Los Angeles City Fire Code requirements, the walkway would also function as an emergency fire lane). No non-emergency vehicles would be allowed to travel along the pedestrian walkway/fire road to the southerly portion of campus due to safety reasons. Furthermore, the project would provide improved access and circulation on-site, thereby minimizing the potential for pedestrian/vehicle and bicycle/vehicle conflicts. The project's impacts related to pedestrian/bicycle safety would be less than significant.

(h) Consistency with Plans

As analyzed above, the project would not add 150 or more trips to a freeway in any direction and would not add 50 or more trips to any CMP intersections during the peak hours. Thus, the project would not meet the CMP requirements that require further CMP intersection and freeway analysis. As such, the project would be consistent with the 2004 CMP for Los Angeles County. Furthermore, as shown in Table IV.J-10 on page 376, the project would be consistent with the applicable transportation policies of the Community Plan.

3. CUMULATIVE IMPACTS

The traffic models utilized in the above analysis incorporated forecasted traffic increases due to ambient growth and related projects through the future study year (2014). Furthermore, the CMP analysis presented above evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, residential neighborhoods, and regional transportation system as a result of the proposed project have been analyzed. Impacts pertaining to site access/queuing are localized impacts. As there are no other related projects within the immediate project vicinity, the project would not contribute to cumulative impacts for these issue areas. With regard to parking and emergency access, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. Therefore, cumulative impacts related to these issues would be less than significant.

4. MITIGATION MEASURES

a. Construction

As analyzed above, no mitigation measures are feasible which could reduce construction traffic impacts to a level that is less than significant. However, to minimize construction-related traffic impacts and to address neighborhood concerns, the following mitigation measures are proposed:

Mitigation Measure J-1: Temporary "Truck Crossing" warning signs shall be placed in each direction in advance of the intersection of Stansbury Avenue and Valley Vista Boulevard.

Mitigation Measure J-2: A flag person or persons shall be positioned near the project site to assist truck operators in entering and exiting the project area, and to help minimize conflicts with pedestrians and other motorists.

Table IV.J-10

Project Consistency with Community Plan Policies

Community Plan Policy	Analysis of Consistency
Policy 11-1.1 – Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., car pools, vanpools, buses, flex time, bicycles, and walking etc.)	The project would continue to utilize the eight bus routes, as well as the late bus service, to transport students to and from the project site. In addition, Mitigation Measure IV.J-1 is proposed that would require the submittal of a TDM Plan to the City. The TDM plan would encourage alternatives to the automobile. Thus, the project would be consistent with Policy 11-1.1 of the Community Plan.
Policy 11-1.3 – Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	Mitigation Measure IV.J-1 is proposed that would require the submittal of a TDM Plan to the City. The goal of the TDM plan would be to reduce trips so that there would be no increase in daily vehicle trips over existing conditions. Thus, the project would be consistent with Policy 11-1.3 of the Community Plan.
Policy 13-1.1 – Maintain a satisfactory LOS for streets and highways that should not exceed LOS "D" for Major Highways, Secondary Highways, and Collector Streets. If existing levels of service are LOS "E" or LOS "F" on a portion of a highway or collector street, then the level of service for future growth should be maintained at LOS "E".	As analyzed above, seven intersections are projected to operate at LOS E or F in the future year 2014 even without implementation of the project. The project would result in significant impacts to three of these intersections. However, with the implementation of mitigation measures, impacts attributable to the project would be less than significant. In addition, with the proposed mitigation measures, the project would actually improve the LOS at two of the three intersections when compared with future conditions without the project. Thus, the project would help to support Policy 13-1.1 of the Community Plan.
Policy 13-1.4 – New development projects should be designed to minimize disturbance to existing flow with proper ingress and egress to parking.	As analyzed above, the project is designed to provide improved on-site access and circulation. A new enclosed parking facility with an expanded student pick-up/drop-off area would be constructed to provide sufficient parking and queuing capacity for vehicles on campus. The new arrival plaza would also serve to maximize the vehicle queuing capacity of the campus by enabling buses to stage on site for student loading and unloading. Thus, the project would be consistent with Policy 13-1.4 of the Community Plan.
Policy 13-2.1 – No increase in density and intensity shall be effectuated by zone change, variance, conditional use, parcel map, or subdivision unless it is determined that the transportation system can accommodate the increased traffic generated by the project.	As analyzed above, prior to mitigation, the project would result in significant impacts to three study intersections and one residential segment. However, with implementation of the proposed mitigation measures, impacts would be reduced to less than significant levels. Thus, the project would be consistent with Policy 13-2.1 of the Community Plan.

Source: PCR Services Corporation, 2006.

Mitigation Measure J-3: To the greatest extent possible, the arrival and departure of construction trucks shall be minimized during peak student arrival and departure periods, and peak commuter periods.

b. Operation

As analyzed above, the project would significantly impact three study intersections and one residential street segment. The following mitigation measures are proposed to reduce such impacts to a level that is less than significant:

Mitigation Measure J-4: Transportation Demand Management (TDM) – Implement an enhanced TDM Plan that improves carpooling and bus ridership for students and achieves at least a 40 percent reduction in project daily trips (75 trips in the A.M. peak hour). The ultimate goal of the TDM Plan would be to reduce project trips so there would be no increase in daily trips above that currently generated by the site. This will result in a trip ceiling of 702 trips in the A.M. peak hour. The TDM plan shall encourage the use of rideshare/carpool, public transportation and privately operated bus shuttle services. The final TDM Plan would be refined in consultation with LADOT. This plan shall be submitted to the DOT Development Review Section for approval at the beginning of each school year. (Refer to Appendix L of this EIR for a draft of the proposed TDM Plan).

Mitigation Measure J-5: Ventura Boulevard and Stansbury Avenue – Widen Stansbury Avenue by 10 feet along the east side of Stansbury Avenue between Ventura Boulevard and the alley south of Ventura Boulevard.[154] Restripe Stansbury Avenue to provide one exclusive left-turn lane and one exclusive right-turn-only lane in the northbound direction.

Mitigation Measure J-6: Valley Vista Boulevard and Stansbury Avenue – Stripe southbound Stansbury Avenue and eastbound Valley Vista Boulevard to each provide one left-turn/through shared lane and one right-turn-only lane in the southbound and eastbound directions.[155] The removal of approximately three on-street parking spaces would be required along the west side of Stansbury Avenue north of the intersection, in addition to approximately one to two on-

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[154] *These transportation improvements shall be guaranteed through the B-permit process of the Bureau of Engineering, Department of Public works. Any improvements shall be constructed and completed before the issuance of the final certificate of occupancy, to the satisfaction of DOT and the Bureau of Engineering. Prior to setting the bond amount, the Bureau of Engineering shall require that the developer's engineer or contractor contact DOT's B-Permit Coordinator to arrange a pre-design meeting to finalize the design for the required transportation improvements. Additional street improvements may be required. The applicant should contact the Bureau of Engineering, Department of Public Works to determine any other requirements. Any street dedication shall be completed through the Department of Public Works, Bureau of Engineering, Land Development Group, before the issuance of any building permit for this project.*

[155] *This mitigation measure, which was required by LADOT in its traffic assessment letter (included as Appendix L-1), reflects a slight variation from the mitigation measure for this intersection recommended in the traffic study, but mitigates significant impacts at the intersection to a less than significant level to generally the same degree.*

street parking spaces along the south side of Valley Vista Boulevard west of the intersection.

Mitigation Measure J-7: Stansbury Avenue – All student drop-off and loading shall take place entirely on-site, without any on-street student drop-off. The School shall prepare a student drop-off and pick-up plan to be reviewed by the LADOT district office. The plan shall include provisions for staggered drop-off and pick-up hours so as to reduce queuing on-site. The plan shall also include provisions for penalties for parents who do not follow the drop-off and pick-up rules. The plan shall also include a site plan of the school with the drop-off and pick-up areas clearly designated.

Mitigation Measure J-8: Compliance Report - The applicant shall be required to hire a licensed traffic engineer as a consultant to conduct traffic trip counts at the school and submit a Compliance Report to DOT during the fall of each year. The applicant shall be required to submit the fall Compliance Report before the end of November of each year. If the school exceeds its trips ceiling (i.e., 702 trips in the A.M. peak hour), the school shall conduct new counts and submit a spring Compliance Report before the end of April of each year. In the event that the applicant is not in compliance with the trip ceiling in the spring Compliance Report, the applicant shall be required to pay a $1,000 (one thousand dollars) penalty to the City of Los Angeles for each A.M. trip that the school generates in excess of its trip ceiling or reduce the student enrollment for the following school year an amount equal to the number of peak hour trips exceeded during the previous year. If the project trip generation proves to be in compliance with the established trip ceiling for five consecutive years the applicant shall no longer be required to submit the Compliance Reports to DOT.

Mitigation Measure J-9: Site Access and Circulation - All loading and unloading of students must be accomplished on-site. The reservoir space for dropping off or picking up students must be large enough so that vehicles do not encroach onto the City right-of-way. It needs to be substantially in conformance with the design submitted to DOT on August 4, 2006 as part of the On-Site Queuing Capacity Analysis.

Mitigation Measure J-10: Site Access and Circulation - Final DOT approval shall be obtained regarding the project’s driveways, internal circulation and parking schemes prior to issuance of any building permits. This should be accomplished by submitting detailed site and driveway plans, with a minimum scale of 1”-40’, to DOT’s Valley Development Review Section.

5. LEVEL OF SIGNIFICANCE AFTER MITIGATION

As shown in Table IV.J-11 and Table IV.J-12 on page 380, implementation of the above mitigation measures would reduce operational traffic impacts at the three intersections and residential street segment to levels that are less than significant.

Temporary construction-related traffic impacts would remain significant even after the implementation of mitigation measures. There are no feasible mitigation measures which could reduce construction-traffic impacts to levels that are less than significant. The only reasonable alternative mitigation would be to extend the construction time frame so that there would be less construction personnel and vehicles on site at any give time. However, such a measure would be inefficient as well as costly and would prolong disruption to School operations and the surrounding neighborhood. Nevertheless, the mitigation measures above would help to minimize construction impacts to the extent possible.

Table IV.J-11

CMA and LOS Summary
Future (2014) Traffic Conditions—With Project, Plus Mitigation

			Without Project		With Project			With Project + Mitigation		
No.	**Intersection**	**Peak Hour**	**CMA**	**LOS**	**CMA**	**LOS**	**Impact**	**CMA**	**LOS**	**Impact**
3.	Ventura Blvd. & Stansbury Ave.	A.M.	1.311	F	1.336	F	0.025*	1.151	F	-0.160
		School P.M.	1.113	F	1.130	F	0.017*	1.039	F	-0.074
		Commuter P.M.	1.197	F	1.205	F	0.008	1.113	F	-0.084
8.	Valley Vista Blvd. (S) & Beverly Glen Blvd.	A.M.	1.043	F	1.058	F	0.015*	1.052	F	0.009
		School P.M.	1.595	F	1.605	F	0.010*	1.601	F	0.006
		Commuter P.M.	1.655	F	1.661	F	0.006	1.658	F	0.003
9.	Valley Vista Blvd. & Stansbury Ave.	A.M.	1.131	F	1.168	F	0.037*	0.886	D	-0.245
		School P.M.	0.590	A	0.616	B	0.026	0.601	B	0.011
		Commuter P.M.	0.584	A	0.594	A	0.010	0.586	A	0.002

* *Denotes significant project traffic impact, prior to implementation of project mitigation.*

Source: Crain & Associates, March 2006.

Table IV.J-12

Residential Street Traffic Impact Analysis
Future (2014) Average Daily Traffic Conditions—With Project, Plus Mitigation

No.	**Street Segment**	**Without Project**	**Project Traffic**	**With Project**	**Percent Project Traffic**	**With Project + Mitigation**	**Percent Project Traffic**
2.	Stansbury Ave. South of Valley Vista Blvd.	2,506	293	2,799	10.47%	2,682	6.56%

* *Denotes significant project traffic impact, prior to implementation of project mitigation.*

Source: Crain & Associates, March 2006.

V. ALTERNATIVES

1. SUMMARY OF THE ALTERNATIVES

Under CEQA, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process. Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, the purpose of an environmental impact report is to identify alternatives to the project.

Direction regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[156] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[157]

In selecting project alternatives for analysis, potential alternatives should be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries,… and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site . . . ."

[156] *CEQA Guidelines Section 15126.6(b).*

[157] *Ibid, Section 15126.6(f).*

The CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project/No Build Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[158]

Implementation of the proposed project would result in unmitigable short-term aesthetics, air quality, noise, and traffic impacts during construction, as well as significant but mitigable impacts to biological resources, cultural resources, hazards and hazardous materials, and operational traffic. Based on these potentially significant environmental impacts and the objectives established for the project (refer to Section II, Project Description, Subsection B., Statement of Project Objectives, in this EIR), as well as consideration of the General Plan and zoning designations applicable to the project site, the following alternatives to the proposed Buckley School Campus Enhancement Plan were evaluated:

A. No Project/No Build Alternative
B. Alternative Use (All Residential) Alternative
C. Single Level Parking Facility Alternative
D. No Parking Facility Alternative
E. Previous Project Alternative

Each of these alternatives are described and evaluated in the sections that follow. Alternative A, the No Project/No Build Alternative, assumes that the project is not approved and the project site remains unchanged from existing conditions. A No Project/No Build Alternative is required under Section 15126.6(e) of the CEQA Guidelines. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible. Such potential alternatives are described below.

2. ALTERNATIVES CONSIDERED AND REJECTED

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible include:

[158] *Ibid, Section 15126.6(e)(2).*

- **Alternative Site:** At various times in its history, the Buckley School has researched the possibility of moving the campus to an alternative location. The results of this search have indicated that suitable similar locations are not available in proximity to the existing campus. A new site of insufficient size would not be able to accommodate the current educational activities offered by the school, and a site located exceedingly distant from the existing campus would not be able to serve the existing student population base. Specific efforts included investigation into the purchase of a site off Topanga Canyon in 1991–1992; however, access to the site proved to be a serious obstacle. Numerous efforts followed over the next 10 years to find sites that would allow the School to relocate one or more of the academic divisions to create a split campus (discussed further below). An attempt was made again in late 2002 to identify alternative properties for acquisition, but no feasible sites were determined as a result of the research. In addition, development of an Alternative Site would not likely avoid the project's significant construction-related impacts, which are the only unmitigable significant impacts associated with project implementation, as such impacts would merely be relocated to an alternative location. As such, an Alternative Site for the proposed project is considered infeasible.

- **Split Campus Alternative:** The Buckley School has also considered splitting the campus between two or more sites (i.e., separating the Lower, Middle, and/or Upper Schools). Options investigated over the past 15 years have included purchasing property or leasing facilities at specific sites in Studio City, on Ventura Boulevard, on Van Nuys Boulevard, and on the Westside, including existing school sites and other suitable commercial sites. Of the existing available facilities considered for relocating school activities, some were too small to accommodate any of the academic divisions, and some were considered impractical due to deficiencies such as a lack of indoor space for physical activity or lack of a common lunch area. Research and negotiations were also conducted in 1991–1992 and 1995 with two nearby schools, including another local independent school, regarding a merger with The Buckley School, but discussions did not proceed beyond the initial stage. Finally, in 1995, the School's Board of Trustees approved entering into a lease on a property at 7715 Burnet Street for transportation, maintenance, printing, business office and bus storage functions, thus freeing space on campus for larger classrooms and additional offices. The business office has remained off campus ever since, and Buckley no longer owns and operates its own buses. In 2001, informal conversations were held with the owners of a property on Riverside Drive in Sherman Oaks regarding the sale of their building, which would have been a an alternative location for the Upper School and business office. It would have also provided significant parking, and as well as the opportunity to build tennis courts in overflow parking areas. The building was never sold and is presently under the same ownership, with portions leased to other business tenants.

Throughout all of these exercises, what has emerged is a strong desire and need to maintain a single campus, consistent with the vision of the School's founder. Development of a split campus would undermine the intention of Dr. Isabelle Buckley, who purchased the existing school site (land formerly occupied by the Glen-Aire Country Club) in the 1960s in order to unify the Lower, Middle, and Upper Schools, which had previously operated on four separate campuses (there was also a preschool at the time). The rationale for consolidating the campuses nearly 40 years ago holds true today: it allows the School to physically function on one campus to offer a comprehensive and articulated K through 12 program and to build an all-inclusive "family" community within a City that by its very size and character does not naturally lend itself to fostering an intimate sense of community. It also allows the School to employ faculty and staff who teach or work for all divisions, thus minimizing administrative costs. Additionally, since a number of school facilities, such as the athletic facilities and performance spaces, are shared between the different grades in order to maximize efficiency in school operations, splitting the campus would preclude optimal use of such facilities to the same degree.

In summary, consideration of a second campus in close enough proximity to the current campus to allow joint use of existing facilities by students of various grades has revealed difficulties in finding an available site of appropriate size, zoning, and location. In any case, were such a site located and found to be feasible, substantial bussing between the two campuses would be necessary, resulting in new traffic impacts on the neighborhood and disrupting the course of the normal school day for Buckley students. Furthermore, a Split Campus Alternative would not achieve the basic project objective of maintaining K through 12 educational facilities in a unified campus to support academic synergies and attain efficiencies in meeting the other educational objectives. Development of a second campus would also conflict with Objective 6-1.5 of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, which states that the expansion of existing schools is considered preferable to the acquisition of new school sites in the City. Finally, the introduction of school uses on a second site would ultimately serve to increase overall environmental impacts by introducing new impacts within a second community.

- **Reduced Intensity Alternative:** A Reduced Intensity Alternative consisting of reduced student enrollment, fewer educational activities on-site and/or a smaller building footprint relative to the proposed project was considered as a development option that could reduce the project's significant environmental impacts while simultaneously retaining sufficient critical development mix and mass to accomplish most of the project's basic objectives, though to a lesser degree. However, a reduction in the proposed student enrollment increase would not eliminate any of the project's significant and unavoidable construction impacts. Additionally, a minor reduction in student enrollment from the proposed 830 students would eliminate few if any of the project's significant but mitigable operational traffic impacts. Only a substantial enrollment reduction (e.g., 770 students) relative to the project would preclude significant operational traffic impacts, but such a reduction would not meet the basic project objectives of optimizing the number of students on-site in order to support Buckley's educational philosophy, enhance curriculum flexibility, and promote a broad curriculum. A student population of 830 has been determined to represent optimal enrollment relative to school operations, allowing Buckley to offer a wide range of educational courses and class sections with a sufficient number of students within each section, and permitting joint use of campus facilities by students of various grades to maximize operational efficiencies. In any case, since the project's significant intersection traffic impacts are fully mitigable, a reduction in student enrollment would have no practical effect on impacts after mitigation as compared to the proposed project.

Likewise, any meaningful reduction in educational activities or building footprint would inhibit the School's ability to address the needs of existing and future programs offered within the campus, including the provision of adequate teaching space for all educational levels, which is the underlying purpose of the project. Additionally, a substantially reduced building footprint would increase—not eliminate—inadequacies in the existing educational facilities located on campus. Furthermore, significant construction impacts could only be avoided with a dramatically reduced development proposal, which would undermine the purpose and objectives of the project currently proposed. Consequently, a Reduced Intensity Alternative designed to reduce project impacts would not achieve most of the project objectives, and an Alternative designed to meet the project objectives would reduce few if any significant impacts of the project. As such, the Reduced Intensity Alternative was rejected as infeasible.

- **Off-Site Parking:** The primary reason for rejecting an alternative where Code-required parking is provided off-site is that the City has directed the School to accommodate Code parking on-site because no off-site parking locations exist within the Code-required radius of 750 feet from the campus. Nevertheless, the School has investigated the possibility of leasing off-site property for parking in lieu of building a new parking facility on-site. Apart from deviating from Code requirements, this has proven to be an ineffective long-term solution for a number of practical reasons: the continued availability of an off-site lot cannot be guaranteed; there is a dearth of available parking in the Sherman Oaks community; the School is not permitted to use its existing off-site parking location at Fashion Square as a drop-off point for anyone other than student drivers; there may be safety concerns for young students being shuttled to/from campus, particularly in instances when children arrive at the off-site pick-up location prior to the arrival of their parents; there would be substantial liability issues; and such a parking program would pose major logistical issues and be disruptive to class schedules and the general academic experience. In addition, new long-term traffic, noise, and air quality impacts could result from the continuous operation of shuttles up and down Stansbury Avenue. Therefore, any type of alternative with off-site parking was rejected as infeasible.

3. ANALYSIS FORMAT

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description would be substantially attained by the alternative.[159] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR.

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue area. Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more adverse or less beneficial than the project, the comparative impact is said to be "greater." Where the impacts of the alternative and project would be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are substantially attained by the alternative.

Table V-1 on page 387 provides a summary matrix that compares the impacts associated with the project with the impacts of each of the proposed alternatives. Of course, there are numerous potential combinations between a respective alternative and the proposed project or between two or more alternatives. No attempt has been made to analyze these, though it can be presumed that the impact profile of most such combinations would fall within the overall envelope of identified impacts for all of the evaluated alternatives.

[159] *Ibid, Section 15126.6(c).*

Table V-1

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative A No Project/No Build	Alternative B - All Residential Alternative	Alternative C - Single Level Parking Facility Alternative	Alternative D - No Parking Facility Alternative	Alternative E - Previous Project Alternative
A. Aesthetics						
Aesthetics						
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Construction	Significant and Unavoidable	Less (Project Impact Avoided)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Project Impact Avoided)
Views	Less Than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less than Significant)
Light and Glare	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less than Significant)
Consistency with Regulatory Policies	Less Than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
B. Air Quality						
Construction						
Regional Emissions	Significant and Unavoidable	Less (Project Impact Avoided)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Local Emissions	Significant and Unavoidable	Less (Project Impact Avoided)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Operation						
Regional Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
Local Emissions	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
C. Biological Resources						
Biological Resources (Jurisdictional Drainages)	Less Than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)

Table V-1 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative A No Project/No Build	Alternative B - All Residential Alternative	Alternative C - Single Level Parking Facility Alternative	Alternative D - No Parking Facility Alternative	Alternative E - Previous Project Alternative
Wildlife Corridors	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)
Native Trees	Less Than Significant w/ Mitigation	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
Nesting Birds	Less Than Significant w/ Mitigation	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
D. Cultural						
Paleontological Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Greater (Less Than Significant w/ Mitigation)
E. Geology						
Seismic and Geologic Hazards	Less Than Significant w/ Mitigation	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Landform Alteration	Less Than Significant w/ Mitigation	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Greater (Less Than Significant w/ Mitigation)
Sedimentation and Erosion	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Greater (Less Than Significant)
F. Hazards and Hazardous Materials						
Hazardous Materials	Less Than Significant	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

Table V-1 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative A No Project/No Build	Alternative B - All Residential Alternative	Alternative C - Single Level Parking Facility Alternative	Alternative D - No Parking Facility Alternative	Alternative E - Previous Project Alternative
Asbestos and Lead Based Paints	Less Than Significant w/ Mitigation	Less (Project Impact Avoided)	Similar (Less than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)
Underground Storage Tanks	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less than Significant) w/ Mitigation)	Similar (Less than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)
Emergency Access	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less Than Significant)
G. Hydrology						
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Greater (Less Than Significant)	Greater (Less than Significant)	Similar (Less Than Significant)
H. Land Use						
Consistency with Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)	Similar (Less Than Significant)
Land Use Compatibility	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)	Similar (Less than Significant)	Similar (Less Than Significant)
I. Noise						
Construction	Significant and Unavoidable	Less (Project Impact Avoided)	Greater (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Operation	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant w/ mitigation)	Greater (Less Than Significant w/ mitigation)	Similar (Less Than Significant w/ mitigation)

Table V-1 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative A No Project/No Build	Alternative B - All Residential Alternative	Alternative C - Single Level Parking Facility Alternative	Alternative D - No Parking Facility Alternative	Alternative E - Previous Project Alternative
J. Transportation & Circulation						
Construction						
Traffic	Significant and Unavoidable	Less (Project Impact Avoided)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Greater (Significant and Unavoidable)
Parking	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less Than Significant)
Operation						
Traffic	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant w/ Mitigation)	Similar (Less than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Access and Queuing	Less Than Significant	Greater (Less Than Significant)	Less (Less Than Significant)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Parking	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Public/School Transit	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Pedestrian/Bicycle Safety	Less Than Significant	Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Consistency w/ Policies	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

Source: PCR Services Corporation, 2006.

V. ALTERNATIVES
A. ALTERNATIVE A: NO PROJECT/NO BUILD ALTERNATIVE

1. DESCRIPTION OF THE ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative A) assumes that the project would not be approved and no new development would occur within the project site. Thus, the physical conditions of the School would remain as they are today. No new buildings would be constructed, none of the existing facilities would be expanded or improved, and the existing buildings would continue to function as they currently do, with no increase in student enrollment. Internal circulation and parking on the existing campus would also remain unchanged. The site plan under this Alternative would resemble existing conditions, as shown in Figure II-3 in Section II, Project Description.

Accordingly, this Alternative would be equivalent to the conditions on the project site discussed in Section III, Environmental Setting, for each category analyzed in this EIR. Under this Alternative, a new Conditional Use Permit (CUP) would not be required, nor would any new or revised conditions be imposed on school operations. While the existing uses would remain generally consistent with the current General Plan designations and zoning for the site, the existing inconsistencies with applicable height and land use regulations set forth by the Los Angeles Municipal Code (LAMC) and the Mulholland Scenic Parkway Specific Plan (MSPSP), respectively, would continue to exist.[149]

[149] *The Buckley School currently includes legally non-conforming building heights and land uses with respect to LAMC and MSPSP requirements, as the existing structures and uses pre-date implementation of the City's Hillside Ordinance and the MSPSP. The Hillside Ordinance restricts building heights to 36 feet. The MSPSP designates an Institutional Use Corridor, within which uses such as schools and accessory buildings are permitted; the Buckley School campus is located outside of the Institutional Use Corridor. Please refer to Section IV.H, Land Use, of this EIR for further discussion.*

2. ENVIRONMENTAL IMPACTS

a. Aesthetics, Views, and Light and Glare

The No Project/No Build Alternative would not involve any additional development of the site, and the existing campus layout would remain as it currently exists. As such, the existing visual character of the site would not change, and existing views within the project area would not be affected. Additionally, light and glare conditions on-site would not change, thus no impact would occur. As discussed in Section IV.A, Aesthetics, of this EIR, implementation of the proposed project would result in less than significant operational impacts associated with aesthetics, views, and light and glare. Since no impacts related to aesthetics, views, and light and glare would occur under the No Project/No Build Alternative, the project's less than significant aesthetic, views, and light and glare impacts during operation would be avoided. Additionally, as the No Project/No Build Alternative would not involve any construction activities, the temporary placement of the modular classrooms on the athletic field would not occur. Thus, the significant aesthetic impact associated with construction of the project would be avoided under the No Project/No Build Alternative. Impacts associated with this Alternative would thus be less as compared to the proposed project.

b. Air Quality

This Alternative would not result in any increase in emissions associated with construction activities or changes to existing operations within the campus. Therefore, the No Project/No Build Alternative would not violate any air quality standards, contribute to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, or generate odors that result in a nuisance as defined by South Coast Air Quality Management District (SCAQMD) Rule 402. Air quality impacts under this Alternative would not occur. As such, under the No Project/No Build Alternative, the short-term significant regional and local emissions impacts associated with construction of the project would be avoided. Additionally, as no increase in student enrollment would occur, the No Project/No Build Alternative would not experience an increase in operational emissions and the less than significant impacts associated with increased emissions from operation of the proposed project would not occur. Furthermore, operational impacts related to toxic air contaminants and odor would not occur, and no conflict with adopted air quality plans and policies would result. Impacts associated with this Alternative would be reduced in comparison to the proposed project.

c. Biological Resources

Under the No Project/No Build Alternative, the existing campus facilities would remain and no additional development would occur. As such, the removal of existing trees, including native oak and walnut trees, required for construction of the proposed project would be avoided. Existing trees would remain undisturbed, and no associated impacts would occur. Consequently, no impacts to nesting birds would result. The project's less than significant impacts (following mitigation) would thus be avoided.

d. Cultural Resources

The No Project/No Build Alternative would not require grading or excavation for the construction of new buildings since development would not occur. As such, the Alternative would not result in potential impacts associated with the discovery of unknown paleontological resources. Under the No Project/No Build Alternative, the significant but mitigable impacts that would occur with the project would be avoided, and impacts would be reduced. However, it should also be noted that under the No Project/No Build Alternative, the benefit of recovering important fossil remains would not be realized. The potential recovery of fossil remains, as part of the proposed project's construction, could help answer important questions regarding the geographic distribution, stratigraphic position, and age of fossilferous sediments in the immediate area.

e. Geology

Under the No Project/No Build Alternative, site preparation activities such as grading, excavation, and cut and fill operations would not occur. Similar to the proposed project, this Alternative would not destroy, modify, or cover a distinct or prominent geologic or topographic feature or create geologic hazards. Nonetheless, the project's less than significant impacts (with mitigation) relative to landform alteration, site design, grading, and erosion would be avoided.

While the existing Buckley School campus is currently exposed to a degree of seismic hazard risk, these risks would not be worsened or accelerated from implementation of the No Project/No Build Alternative. Seismic hazards impacts associated with the Alternative would be similar when compared to the proposed project's impacts.

f. Hazards and Hazardous Materials

The No Project/No Build Alternative would not alter the existing school uses on the project site, nor would it introduce new uses or activities. Hazardous substances would continue to be used in small quantities and would consist of the same types of materials currently used on-site. These substances would include pesticides and fertilizer for landscaping, gasoline, diesel fuel, paint, spray paint, adhesives, coatings, stains, seals, chlorine and other pool chemicals, various laboratory chemicals, glazes and printing chemicals. All hazardous substances would continue to be contained, stored, and used in accordance with manufacturers' instructions and applicable standards and regulations. Thus, this Alternative would not result in an increase in hazards relative to the routine transport, use, or disposal of hazardous materials. Impacts related to hazardous substances would be less than significant and would be similar as compared to project impacts.

Under the No Project/No Build Alternative, the existing structures on the campus would remain intact and as such, the potential for release of asbestos fibers (asbestos-containing materials or ACMs) and uncovering of lead-based paints due to building demolition would not occur. Thus, the project's less than significant impact (following mitigation) associated with asbestos and lead-based paint would be avoided with this Alternative. Furthermore, no grading or excavation activities would occur under the No Project/No Build Alternative. Thus, this Alternative would not have the potential to encounter the unlikely contamination in soils associated with the possible underground storage tank (UST) in the vicinity of the former bus maintenance garage. However, the benefit of removing this potential UST would not be realized under the No Project/No Build Alternative.

The No Project/No Build Alternative would not change the site's existing access and circulation scheme. Therefore, no impacts to emergency access and response would occur. However, the beneficial impacts of the project relative to access and queuing would not occur under the No Project/No Build Alternative. Nonetheless, the No Project/No Build Alternative's impacts related to emergency access would be generally similar to the project, with no change in existing conditions.

g. Hydrology

As the No Project/No Build Alternative would not involve any new construction, no grading activities that could result in erosion would occur. As such, the hydrology and surface water quality impacts that would result from project construction would not occur with the No Project/No Build Alternative. A National Pollutant Discharge Elimination System (NPDES) general construction permit and implementation of a Storm Water Pollution Prevention Plan (SWPPP) would not be required. Furthermore, the No Project/No Build Alternative would not change the amount or layout of impervious areas on the site. Thus, there would be no increase in surface runoff, and no changes to existing drainage patterns would occur. Impacts related to hydrology would not occur, and the less than significant impacts identified for the project would be avoided.

h. Land Use

Under the No Project/No Build Alternative, there would be no changes to the land uses on-site, and the school would continue to operate with the current facilities. While the existing uses would remain generally consistent with the current General Plan designations and zoning for the site, the existing legally non-conforming building heights and land uses relative to applicable regulations set forth by the Zoning Code and the MSPSP, respectively, would continue to exist. Under this Alternative a new Conditional Use Permit (CUP) would not be required, nor would any new or revised conditions be imposed on school operations as would occur under the project. Furthermore, in contrast to the project, the No Project/No Build Alternative would not require any Specific Plan Exceptions, modification of the height regulations pursuant to LAMC §12.24F, or a parcel map to create two legal lots on-site. Thus, while impacts would also be less than significant, this Alternative would have a reduced level of impact compared to the project.

i. Noise

As no construction activities would occur under the No Project/No Build Alternative, no short-term increase in noise levels associated with construction would occur. As such, the significant construction noise impact that would occur under the project would be avoided under this Alternative. Additionally, the No Project/No Build Alternative would not result in an increase in traffic and would not introduce new noise sources. School uses, including outdoor athletic activities, would continue on the campus as they do currently. Since no changes in the existing noise conditions would occur, noise levels would remain the same. The project's less than significant operational noise impact resulting from an increase in traffic and School enrollment would not occur, and the No Project/No Build Alternative would have a lesser impact on noise levels as compared with the project.

j. Transportation and Circulation

No new construction would result from the No Project/No Build Alternative. As such, no increase in traffic due to construction-related vehicles would occur on the local and regional street system. Therefore, the project's significant construction-related traffic impact and the less than significant construction parking impact would not occur under the No Project/No Build Alternative. With the No Project/No Build Alternative, the School would maintain its existing student enrollment and staffing levels. Thus, no increase in operational traffic would occur and the project's mitigated, less than significant impacts on three intersections and one residential segment would also be avoided.

The No Project/No Build Alternative would not change the existing on-site access and circulation scheme, and consequently, the project's beneficial improvements to eliminate the queuing of vehicles on Stansbury Avenue would not occur. Therefore, impacts related to access and circulation would be greater for the No Project/No Build Alternative. Similarly, as the No Project/No Build Alternative would not improve on-site access and circulation, the beneficial effect of reducing the potential for pedestrian/bicycle conflicts that would occur as part of the project would not be realized. Impacts related to pedestrian/bicycle safety would be greater than those of the project.

The existing parking supply and parking scheme would remain unchanged from existing conditions. The project site's approximate 214 marked parking spaces would continue to be available for student carpools, visitors, and staff, and students would continue to park in the off-site Sherman Oaks Fashion Square parking lot.[150] This Alternative would also leave the School with continued reliance on a minimal pick-up/drop-off area, given the existing configuration of the main northern parking lot. In addition, the No Project/No Build Alternative would not have the beneficial impact of the project wherein sufficient parking to meet demand would be provided on-site. As such, parking impacts would be greater than those of the project. Although sufficient parking to meet campus demand would not be provided on-site, parking impacts would remain less than significant under the No Project/No Build Alternative.

Lastly, as the No Project/No Build Alternative would not result in an increase in student enrollment or associated traffic, the project's less than significant impacts to public transit, school transit, and consistency with regulatory plans would not occur. As compared with the project, impacts with regard to these issues would be reduced.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The No Project/No Build Alternative would not meet the underlying purpose of the project to address the needs of existing and future programs offered within the campus since it would not provide adequate teaching space for all educational levels, specialty teaching spaces, or multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The No Project/No Build Alternative also would not provide for vehicular circulation and queuing improvements or increased parking on-site.

Under the No Project/No Build Alternative, almost none of the project's educational objectives would be met. Specifically, this Alternative would not modernize and reconfigure instructional space; create separate dedicated facilities for the athletic, visual arts, and performing arts programs; create science facilities as well as additional classrooms that reflect the needs of the twenty-first century Buckley student; create state-of-the-art library and technology facilities; provide appropriate instructional space for all of the school programs; accommodate a modest increase in total student enrollment to support Buckley's educational philosophy, enhance curriculum flexibility, and promote high academic standards encompassing a broad curriculum; nor would it introduce an Aquatic Center with an outdoor competition

[150] *While the lease for this off-site parking site has been renewed for the 2006-2007 school year, there is no guarantee of its continued availability in the future.*

swimming pool in order to consolidate the swimming program and associated uses and optimize indoor multipurpose space within the Disney Pavilion.

Additionally, the No Project/No Build Alternative would not meet many of the site planning objectives of the project. This Alternative would not eliminate the existing queuing of vehicles on Stansbury Avenue and thus, the objective to respect the residential character of the surrounding neighborhood would not be achieved to the same degree. With the No Project/No Build Alternative, no improvements to the existing campus layout or buildings would occur, and as such, this Alternative would not meet the objectives to provide facilities that meet modern fire protection, disabled access, and energy efficiency standards; create on-campus parking spaces that sufficiently accommodate the vehicles operated by students, parents, and visitors that travel to the campus on a regular daily basis; contain vehicle queuing and student drop-off/pick-up within the campus; unify the campus and eliminate operational and safety challenges by eliminating regular access (except for emergency vehicles) along the internal roadway that currently bisects the campus; revise operating conditions that are confusing or stimulate difficulties between Buckley and its neighbors and incorporate current City standards for private schools within the City; create a visually unified campus and further harmonize structures and landscaping with the natural landforms that surround the campus; upgrade mechanical facilities and improve energy efficiency throughout the campus by centralizing mechanical infrastructure within a Central Plant, and minimize hardscape and roadways in favor of a landscaped campus featuring native plant species appropriate for the canyon setting.

The No Project/No Build Alternative would not require construction activities, and thus the construction-related objectives to minimize impacts and disruption of classes would be achieved. Additionally, the objectives relative to the location of construction and design of new development would not be applicable since no new development would occur.

The Alternative would not achieve the Community Plan and Specific Plan objectives to provide adequately sized educational facilities to serve the needs of the existing and future population; and to emphasize a campus layout, building scale, and architectural design that improves the functionality of the campus, is compatible with the character of the surrounding community, and complements the existing structures on-site. Additionally, as the No Project/No Build Alternative would not eliminate the existing queuing on Stansbury Avenue (which is considered a land use compatibility issue), the Specific Plan objective to promote land use compatibility with surrounding uses would not be met.

Since the No Project/No Build Alternative would not require any new construction, the following Community Plan and Specific Plan objectives would be achieved: to ensure adequate public services and facilities; preserve and enhance the scenic resources and features found on-site; and preserve, complement and enhance views.

Overall, under the No Project/No Build Alternative, the vast majority of the objectives established for the project would not be attained, although most of the objectives pertaining to construction and minimization of impacts would be met to a greater degree as compared with the proposed project.

1. DESCRIPTION OF THE ALTERNATIVE

Under an Alternative Use (All Residential) Alternative (Alternative B), the project would not be approved, the Buckley School would subsequently cease operations, and eventually new development would be sought in accordance with the existing residential zoning for the site, RE40-1-H (Residential Estate, Height District 1, Hillside), and the existing General Plan land use designations for the site, Minimum Density Residential and Very Low Residential.[151] Based on the site's residential zoning, its location within a Hillside district, and LAMC slope density calculation requirements, the campus site could accommodate up to 11 single-family residential units.[152] The Alternative Use Alternative would thus involve the development of 11 residences plus necessary infrastructure such as roadways, utility lines, and related facilities. Primary access to the subdivided 18.3-acre property would continue to be provided from Stansbury Avenue via new internal roadway connections, with secondary access via Camino de la Cumbre. It is assumed that this future development would comply with all applicable regulatory requirements, including those set forth in the City's Zoning Code, General Plan, and the MSPSP.[153]

Under the Alternative Use Alternative, all existing school facilities, including approximately 99,150 square feet of building area and the associated athletic field and play areas, would be demolished. The school's existing CUP would be discontinued. For purposes of this analysis, it is assumed that the site would be subdivided and mass-graded by a single developer and then sold to individual property owners for development on a parcel-by-parcel basis and that all of the parcels would be developed over a two to three year time period.[154] In addition, it is

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[151] *It is noted that removal of The Buckley School would result in the loss of the largest employer in Sherman Oaks, which would have a negative economic impact on the area.*

[152] *LAMC §17.05C and §17.02. Refer to calculations prepared by S.E.C. Civil Engineers, Inc., provided in Appendix M of this EIR..*

[153] *Since the project site would be subdivided as part of this Alternative, those residences falling within the Mulholland Scenic Parkway Outer Corridor would be subject to the requirements of the MSPSP, whereas those located outside of the Outer Corridor boundary would not.*

[154] *Although not assumed for this analysis, it is possible that a future developer of the site could apply for a zone change, thus potentially increasing the allowable building density or changing the type(s) of land uses permitted on-site. It is also possible that construction of the residences contemplated for this Alternative could take substantially longer than construction of the project, since the residential lots would be individually developed on a parcel-by-parcel basis, thus prolonging the period of time over which construction activities and construction-related impacts would occur.*

assumed that the residences would be large-scale houses, consistent with existing zoning and similar in character to the surrounding residential uses, or each approximately 5,000 to 8,000 square feet in size, for total development of approximately 55,000 to 88,000 square feet or more. In order to accommodate the residences, demolition of all existing campus facilities would be necessary, yielding substantial export of demolition spoils, and grading would be required throughout the project site. It is estimated that approximately 15,674 cubic yards of soil would be graded (similar to the project), and it is assumed that all cut materials would be used as fill on-site in order to achieve a nearly balanced site in terms of earthwork, with nominal (i.e., less than 1,000 cubic yards) soil import and/or export may be required.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics, Views, and Light and Glare

Demolition of the Buckley School campus and subsequent development on-site would result in visual modifications to the topography, vegetation, and built environment of the site. Although the new residences would be aesthetically compatible with the existing character of the surrounding residential neighborhood, this Alternative would involve the conversion of substantial visible natural open space and the removal of trees and vegetation that are considered visually valuable. Additionally, due to grading activities that would be required to construct the new residences on undeveloped areas of the site, the hillside topography would be altered. Thus, extensive use of retaining walls could also be necessary throughout the site. However, new development would be expected to comply with applicable regulatory requirements, such as those set forth in the MSPSP, MSPSP Design and Preservation Guidelines, and LAMC.[155] Overall, aesthetic impacts would be greater than under the project due to substantial changes in the visual landscape and the conversion of large open space areas, though some may consider the residences more harmonious with the existing visual character of the area. Short-term aesthetic impacts in conjunction with construction activities would be significant due to the extent of demolition and the amount of new construction required throughout the site. Therefore, although the nature of construction impacts would be different, construction impacts associated with this Alternative would be similar to the project's impact in terms of the level of significance.

The Alternative would introduce new light and glare sources within the residences and would extend the hours during which light emissions occur due to nighttime occupancy. Additionally, streetlights would be introduced along the new roadways and outdoor lighting could be introduced along new driveways and walkways, thus emitting more light than the

[155] *Since the project site would be subdivided as part of this Alternative, those residences falling within the Mulholland Scenic Parkway Outer Corridor would be subject to the requirements of the MSPSP, whereas those located outside of the Outer Corridor boundary would not.*

project's low-level security lighting. While the level of light and glare would be expected to increase somewhat, impacts would still be less than significant though greater than the project.

Views of the new residences would be available from numerous off-site locations, including Mulholland Drive, nearby residential streets, and residential properties located at higher elevations throughout the canyon. However, given the topography of the canyon, views of valued visual resources, such as the Santa Susana Mountains in the distance, would not be obstructed from most locations. Impacts to views would be less than significant, similar to the project.

b. Air Quality

The Alternative Use Alternative would develop 11 new residences with related accessory structures on the current project site. The resulting square footage would likely be less than that constructed under the proposed project. However, the Alternative Use Alternative would require the demolition of all existing structures on-site, and as such, demolition activities would be far more extensive than those associated with the project. In addition, in order to accommodate the residences, grading would be required throughout the project site, and the amount of earthwork would be similar to that of the project. While more demolition work and the same amount of earthwork would be required under this Alternative scenario, only the duration (number of days) of grading and demolition activities would increase since, on a daily basis, the maximum quantities of material moved and the number of heavy-duty equipment required would be similar to that expected for the proposed project. Thus, localized particulate matter (PM_{10}) impacts under this Alternative scenario would be similar to those expected under the project and, as with the project, would result in significant short-term local construction impacts. Regional construction emissions, with the exception of grading activities, would likewise be similar to the project as it is assumed that the developer would control and coordinate construction equipment, deliveries, and the other construction activities. Thus, construction impacts under the Alternative Use Alternative would be significant and unavoidable, similar to the project. Construction impacts occurring during the demolition phase would be of longer duration than under the project due to the increased volume and duration of demolition activities.

Operational emissions attributable to stationary sources for residential uses on the project site would be less when compared with those that would be generated by the project due to the reduction in overall square footage. Regional mobile source emissions for this Alternative would also be less due to the decrease in traffic associated with 11 residences as compared to a school. Overall, operation of this Alternative scenario would not violate any air quality standards, contribute to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, or generate odors that result in a nuisance. No significant impacts related to operational air quality would occur as a result of this Alternative, and such impacts would be reduced as compared to the project.

c. Biological Resources

Implementation of the Alternative Use Alternative would affect biological resources, such as native trees and plant communities, throughout the campus since development would not be limited to the already developed areas of the site, as would generally occur under the project. Numerous trees would require removal for construction of the residences, and potentially significant impacts to native oak and walnut trees and nesting birds would likely result. It is assumed that like the project, the layout of residential development under this Alternative would be designed to avoid impacts to jurisdictional water drainage features. Nonetheless, as development of the residences would occur over a greater portion of the site, impacts under this Alternative would be significant but mitigable and greater than those anticipated under the proposed project.

d. Cultural Resources

Given the high paleontological sensitivity of the project area, grading and excavation activities associated with the construction of new residences throughout the 18.3-acre project site would have the potential to directly or indirectly destroy a unique paleontological resource or site and/or a unique geologic feature. Similar to the project, these impacts would be significant but mitigable. However, since construction would occur over a greater area and would occur on undeveloped portions of the site, impacts associated with this Alternative would be greater than those anticipated under the proposed project.

e. Geology

The Alternative Use Alternative would involve site preparation activities such as grading, excavation, and cut and fill operations for construction of the residences within the site. Development of the 11 new residences would occur over a greater area of the site as compared with the project. While the specific development layout for this Alternative scenario cannot be precisely predicted, it is anticipated that construction activities would occur on previously undeveloped areas. Such activities would result in greater modification of the existing topography and potentially, adjacent hillsides. As such, extensive use of retaining walls could also be necessary throughout the site. Thus, impacts associated with landform modification would be greater than the project, but would likely also be less than significant with compliance with applicable regulatory requirements. Since the amount of earthwork required under this Alternative would be similar to that necessary for the project, impacts regarding sedimentation and erosion would be similar and less than significant.

With regard to seismic hazards, this Alternative scenario would result in the exposure of people on-site to a degree of seismic hazard risk similar to developments throughout southern California. Furthermore, as with the proposed project, this Alternative would be constructed in accordance with Uniform Building Code (UBC) and LAMC requirements. Thus, potential impacts associated with seismic hazards would be generally equivalent to the proposed project and would be less than significant.

f. Hazards and Hazardous Materials

Construction activities associated with the Alternative Use Alternative would involve the use of hazardous materials. These materials would be used in accordance with manufacturers' specifications, and therefore impacts would be less than significant and similar to the project. During operation of the Alternative Use Alternative, the types of hazardous materials to be used would be typical of those used for residential uses (i.e., cleaning solvents, pesticides and fertilizer for landscaping, gasoline, paint). All materials used during operation of the Alternative Use Alternative would be in accordance to manufacturer's specifications. Therefore, impacts regarding the use of hazardous substances would be less than significant and would be similar to the project.

Demolition of the existing School structures for construction of the new residences would have the potential to uncover ACMs and lead-based paints. As with the project, compliance with the regulatory framework and appropriate mitigation measures would ensure that impacts would be less than significant. Such impacts related to ACMs and lead-based paint would also be similar to the project.

Although the specific layout of residential development under this Alternative is unknown, due to the potential presence of an inactive UST, the Alternative could potentially result in significant impacts related to hazards and hazardous materials in the area of the former bus maintenance garage area (near the existing Transportation Building). As with the project, mitigation measures to ensure that any UST and associated infrastructure encountered would be removed in accordance with applicable regulatory requirements prior to or during construction would reduce potential impacts to a less than significant level. Impacts associated with this issue would be similar to those for the project.

Under this Alternative scenario, it is presumed that internal roads with adequate emergency access would be constructed for the on-site residences. Due to the discontinuation of the School operations under this Alternative, the existing queuing of vehicles onto Stansbury Avenue would be eliminated. As such, like the project, the Alternative Use Alternative would improve local access conditions. With compliance with applicable regulatory requirements regarding emergency access (e.g., Los Angeles City Fire Code), this Alternative would have a less than significant impact on emergency access that would be similar to the project's.

g. Hydrology

Construction of the residential development would be expected to comply with applicable requirements, including NPDES permit and erosion control requirements and implementation of a SWPPP. Overall, since the Alternative would involve construction over a greater area and would convert certain areas of natural, undeveloped land, water quality impacts would be somewhat greater as compared with the project. Regulatory compliance, however, would ensure that such impacts are also less than significant.

The Alternative Use Alternative would involve the construction of 11 new residences on the project site, and would replace the existing impervious and pervious areas with new surfaces. It is anticipated that the amount of impervious and pervious surfaces would not substantially differ from existing conditions.[156] As such, post-construction runoff rates and the drainage patterns under this Alternative would be similar to those occurring under the project.

Additionally, as the amount of runoff is not anticipated to change substantially, this Alternative would not cause serious flooding during a projected 50-year storm event, substantially increase the amount of surface water in a water body, or result in a permanent, adverse change to the movement of surface water. Impacts related to these issues would be less than significant and similar to the project.

h. Land Use

New residential development within the site would be consistent with the existing zoning and General Plan land use designations of the subdivided properties (collectively, RE40-1-H, RE15-1-H, Minimum Density Residential and Very Low Residential). Based on the zoning, Hillside district location, and LAMC slope density calculation requirements, the campus site could accommodate up to 11 single-family residences with access provided from Stansbury Avenue and Camino de la Cumbre.[157] Under this Alternative, the school's existing CUP would be discontinued and the School's existing legally non-conforming building heights and land uses relative to applicable regulations set forth by the LAMC and MSPSP would be eliminated. As

[156] *This condition assumes that the residences would range in size from approximately 5,000 to 8,000 square feet with a building footprint of approximately half that size, plus impervious surfaces for driveways, patios and other hardscaped features, in addition to a new local street network. The actual amount of impervious surface area could vary, but would not be expected to have a substantial effect on drainage rates and patterns.*

[157] *LAMC §17.05C and §17.02. Refer to calculations prepared by S.E.C. Civil Engineers, Inc., provided in Appendix M of this EIR..*

described above, it is assumed that development of the residences would comply with all applicable regulatory requirements, including those set forth in the City's Zoning Code, General Plan, and the MSPSP.[158] Additionally, residential development at this location would be compatible with surrounding residential and open space uses, though the patterns of activity with new residential would differ clearly from existing, longstanding school activity patterns. Land use impacts associated with the Alternate Use (All Residential) Alternative with respect to consistency with applicable plans/policies and land use compatibility would thus be less than significant and would be less as compared with the project.

i. Noise

The Alternative Use (All Residential) Alternative would generate construction noise levels greater than the project due to the demolition of all existing on-site structures (as compared with the project's selected few). Furthermore, construction noise impacts would be greater than the proposed project since the footprint within which grading and subsequent construction would occur would be expanded. Construction-related noise impacts associated with the Alternative would be greater than the impacts identified for the project, and like the project, such impacts would be significant. Noise associated with operation of residences under this Alternative would be less than that currently generated by the School, as the on-site daytime population would be reduced and the School's outdoor organized activities (e.g., sporting events and practices, etc.) would be removed. While the residential uses would also generate operational noise, including noise associated with outdoor gatherings and potential outdoor swimming pools and/or tennis courts, resulting noise impacts would be less than significant. Additionally, noise levels associated with vehicular traffic would be reduced under this Alternative as compared to the project, since the amount of traffic generated by 11 new residences would be less than the amount generated by the School. As such, operational noise impacts would be less than under the proposed project and less than significant.

j. Transportation and Circulation

Construction-related traffic would be generated by construction workers and truck trips delivering materials to the site and removing debris, soil, and other materials from the site. As indicated above, while more demolition work and the same amount of earthwork would be required under this Alternative scenario, only the duration (number of days) of grading and demolition activities would increase since, on a daily basis, the maximum quantities of material moved and the number of heavy-duty equipment required would be similar to that expected for the proposed project. Given the extent of demolition, grading, and construction activities,

[158] *Since the project site would be subdivided as part of this Alternative, those residences falling within the Mulholland Scenic Parkway Outer Corridor would be subject to the requirements of the MSPSP, whereas those located outside of the Outer Corridor boundary would not.*

significant construction traffic impacts would be expected, similar to the project. In light of constraints on access to the site, feasible mitigation measures that could reduce construction traffic impacts to levels that are less than significant would not likely be available. Traffic impacts associated with construction would thus be significant and unavoidable, though temporary, similar to the project. Construction impacts occurring during the demolition phase would be of longer duration than under the project due to the increased volume and duration of demolition activities.

Given the reduction in on-site population under the Alternate Use Alternative as compared with the proposed project, a reduction in vehicle trips would occur. Operation of this Alternative would generate an estimated 105 daily trips, including 8 trips during the A.M. peak hour and 11 trips during the P.M. peak hour.[159] Hence, this Alternative would likely have less impact on the adjacent streets due to a much smaller trip generation. Operational traffic impacts would be less than significant and less than those associated with the project. The project's significant but mitigable operational traffic impacts would thus be avoided. However, this Alternative would likely increase traffic on Camino de la Cumbre as compared to the project due to the need for access to the new internal roadway network via Camino de la Cumbre.

Under the Alternative Use (All Residential) Alternative, driveways would be constructed at the on-site residences, with new internal roadway connections to provide access via Stansbury Avenue and Camino de la Cumbre. Due to the discontinuation of School operations under this Alternative, traffic levels in the project area would be reduced and subsequently, no queuing on Stansbury Avenue or drop-off/pick-up School activities would occur. Therefore, operation of this Alternative would result in minimal disruption to surrounding traffic and would have a reduced level of impact on access and circulation as compared with the project, though such impacts would be less than significant like the project's.

Additionally, under this Alternative, the School would cease operations and consequently, the need to provide parking for students, staff, and visitors would be eliminated. With the Alternative Use (All Residential) Alternative, parking demand for the residents would be met by garages and driveways on the individual properties per City Code requirements. Street parking along Stansbury Avenue, the primary access route, would be minimal and would be relatively comparable to what would occur with the proposed project. Thus, under this Alternative, parking impacts would be less than significant and similar to the project. Impacts relative to emergency access, public transit, pedestrian/bicycle safety, and consistency with the applicable transportation policies of the Community Plan would also be less than significant, like the project.

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[159] *Crain & Associates; Trip generation information is from the Institute of Transportation Engineers (ITE), Trip Generation, 7th Edition 2003, for single family residences.*

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

Under the Alternative Use Alternative, the Buckley School would cease operations. Thus, the Alternative would not meet the underlying purpose of the project, which is to address the needs of existing and future programs offered within the campus, since it would not provide adequate teaching space for all educational levels, specialty teaching spaces, or multipurpose spaces for educational gatherings that cannot occur in a standard classroom. Additionally, under the Alternative Use Alternative, none of the project's educational objectives would be met, as the School would cease operations.

The Alternative Use Alternative would meet the site planning objective to respect the residential character of the surrounding neighborhood. However, the majority of the site planning objectives pertain specifically to the School and would not be applicable to the Alternative.

Since the Alternative Use Alternative would result in the elimination of the existing School, the Community Plan and Specific Plan objectives to provide adequately sized educational facilities and provide a campus compatible with the surrounding community would not be achieved. However, this Alternative would meet the objective to promote land use compatibility with surrounding uses. Whether this Alternative would achieve the Community Plan and Specific Plan objectives to minimize noise impact, ensure the adequacy of public services and facilities, preserve and enhance scenic resources, and preserve views would be dependent on the final design of the 11 residences.

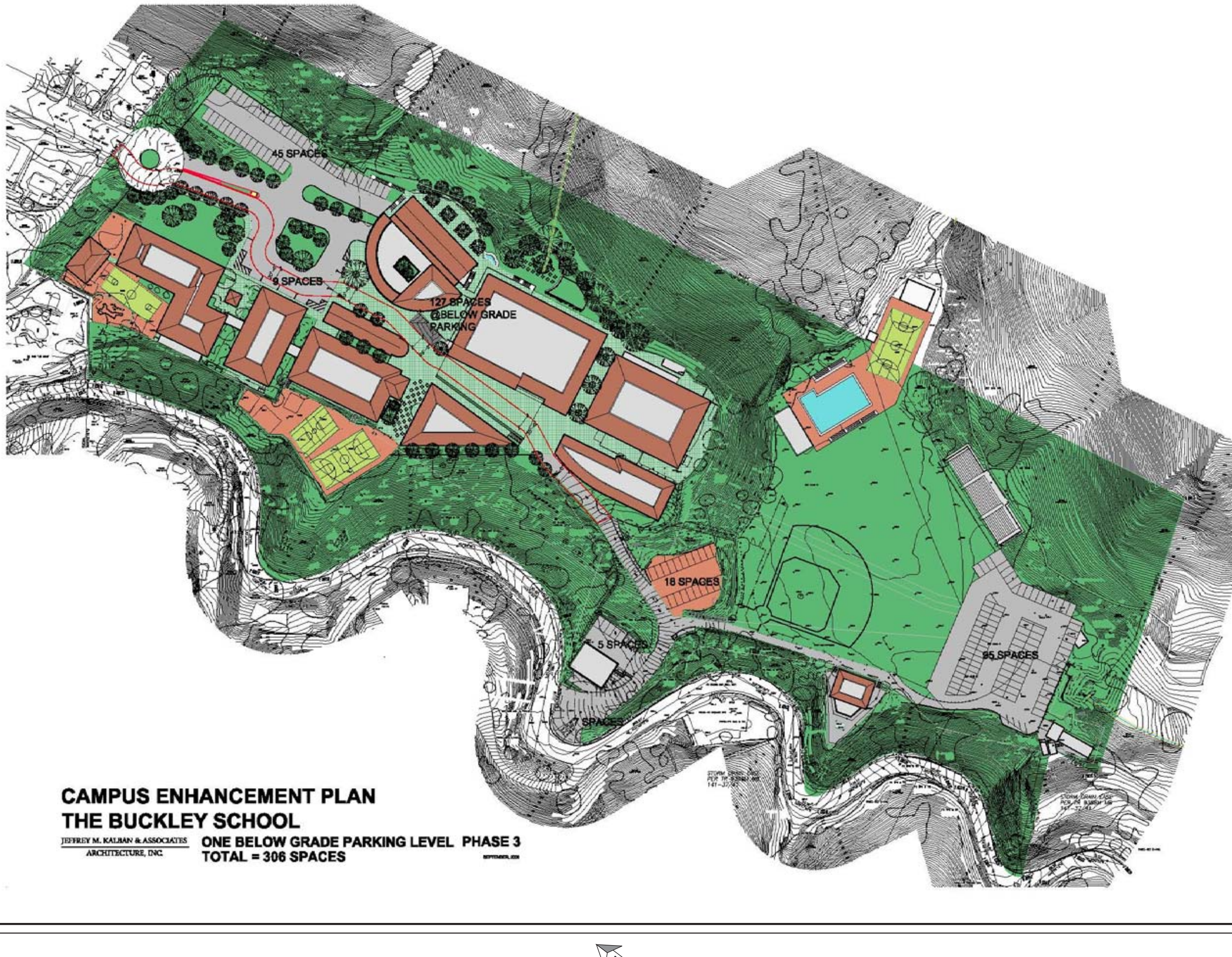
In summary, the Alternative Use Alternative would not achieve any of the project's educational objectives and would not meet many of the site planning objectives. Furthermore, this Alternative may not achieve many of the Community Plan and Specific Plan objectives to the extent that the project would.

1. DESCRIPTION OF THE ALTERNATIVE

The Single Level Parking Facility Alternative (Alternative C) assumes that similar improvements to academic facilities proposed under the project would be implemented. Specifically, a net addition of approximately 69,500 square feet of building area would be developed, resulting in a total of 168,650 square feet of educational facilities within the site. However, under the Single Level Parking Facility Alternative, the proposed Parking Facility would consist of a single enclosed level. As shown in the site plan provided in Figure V-1 on page 409, the Parking Facility in combination with surface parking lots located throughout the campus would provide approximately 306 parking spaces on-site. The main campus entrance would be reconfigured to create a circular arrival plaza, similar to that proposed for the project, allowing for bus queuing as well as access to the Parking Facility. A few of the improvements to campus athletic facilities, school operations, and the site's aesthetic character that are proposed as part of the project would not be implemented under this Alternative. However, all of the academic improvements contemplated under the project would be implemented under the Single Level Parking Facility Alternative, including the proposed increase in student enrollment.

Under the Single Level Parking Facility Alternative, approximately 127 parking spaces would be provided in the enclosed structure. Surface parking would be provided in a small parking lot adjacent to the arrival plaza, another primary parking lot at the southern end of the campus, and in two small parking lots near the Camino de la Cumbre gate. The Parking Facility would allow queuing space for approximately 32 vehicles (compared to 69 under the project), which would alleviate but not necessarily eliminate the queuing on to Stansbury Avenue that occurs under existing conditions. The Single Level Parking Facility Alternative would also require substantial use of the Camino de la Cumbre entrance as a primary access point to the parking areas in the central and southern portions of the campus (which collectively would provide approximately 125 of the total 306 parking spaces under this Alternative).

Aspects of the proposed project that would be implemented under this Alternative include: the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces; a new Aquatic Center, Central Plant, and renovation of various existing buildings; project design elements such as the integration of new construction with existing topography, vegetation, and structures; the proposed central pedestrian walkway/fire road for emergency access; implementation of a landscape plan, including landscaped courtyards and walkways throughout the campus, the planted grove along the main campus entrance drive,



Source: Jeffrey M. Kalban and Associates Architecture, Inc., 2006.

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Figure V-1
Alternative C Site Plan

rows of trees alongside several new and existing buildings, and the turtle pond adjacent to the Middle and Upper School Main Academic Center; changes in student and staffing levels as well as campus hours of operation; and approval of various actions and permits. Project elements that would not be introduced under the Single Level Parking Facility Alternative would include the new basketball court southwest of the Academic Building South, limitations on use of the Camino de la Cumbre gate, and additional greening of the athletic field. In addition, due to the need for substantial surface parking at the south end of campus, the baseball playing field would not meet CIF regulation standards, and a full-size soccer field (which exists under existing conditions) could not be accommodated. As a result, associated athletic programs, practices, and competitions would have to occur off-site, thus requiring the shuttling of students to off-campus facilities and causing disruptions to the School's regular athletic program.

As shown in Figure V-2 on page 411, given the height of the Middle and Upper School Main Academic Center, maximum building heights under the Single Level Parking Facility Alternative would be 45 feet from existing grade, based on the LAMC definition of building height.[160] As such, like the project, this Alternative would require a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F to allow one new building to exceed the maximum 40 feet allowed within the MSPSP Outer Corridor, as well as a modification of the height regulations pursuant to LAMC §12.24F to allow two new buildings to exceed the maximum 36 feet permitted in a residential hillside zone as established by LAMC §12.21A 17(c). The Main Academic Center, however, would visually appear no greater than 33.6 feet in height from most vantage points due to the sloping nature of the site's topography and grade changes proposed as part of the Alternative. A building height of 45 feet and related changes in finished grade would be necessary to accommodate the excavated soils on-site in order to nearly eliminate the need for soil export or import. In any event, all of the new structures would have heights that are generally similar to existing building heights on-site, and no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion, similar to the project.[161]

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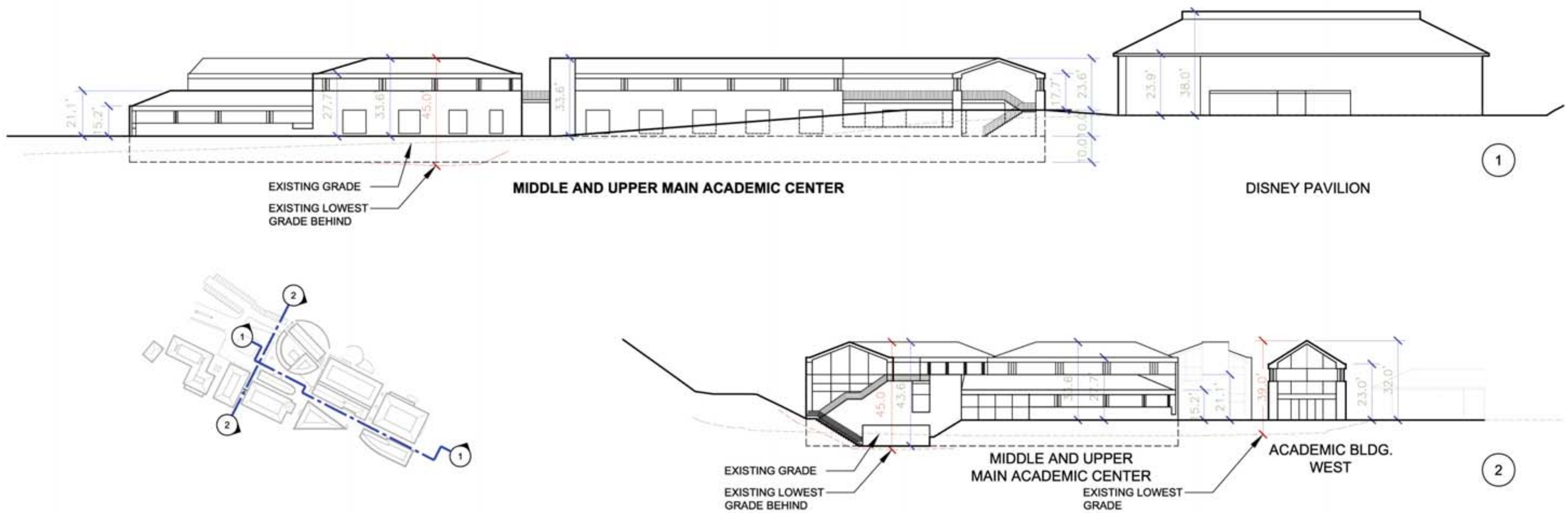
[160] *Per LAMC §12.03, building height is defined as "the vertical distance above grade measured to the highest point of the roof, structure, or the parapet wall, whichever is highest. Retaining walls shall not be used for the purpose of raising the effective elevation of the finished grade for purposes of measuring the height of a building or structure." Also per LAMC §12.03, grade or adjacent ground level is defined as "the lowest point of elevation of the finished surface of the ground, paving or sidewalk within the area between the building and the property line, or when the property line is more than 5 feet from the building, between the building and a line 5 feet from the building." The proposed building heights referenced throughout this analysis each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*

[161] *It is noted that two existing buildings (one of which would be removed as part of the Alternative) have legally non-conforming building heights that exceed the maximum 36-foot height limit for a residential hillside zone set forth by LAMC Section §12.21A 17(c); however, such buildings comply with the 40-foot height limitation set forth by the Mulholland Specific Plan Section 6D. Additionally, due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*



Scale not provided

Source: Jeffrey M. Kalban and Associates Architecture, Inc., 2006.

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Figure V- 2
Alternative C Building Elevations

The total construction period under this Alternative would be approximately two weeks shorter than that of the project, due to the reduced size of the Parking Facility. The general phasing of construction, however, would be similar to the project (i.e., three phases with the respective applicable building components). The modular classroom units or bungalows to be utilized during project construction would be temporarily located on a portion of the athletic field as well as in a small area immediately north of the Academic Building South for school use during construction of this Alternative. The Single Level Parking Facility Alternative would require roughly 15,674 cubic yards of grading, similar to the project. It is assumed that all cut materials would be used as fill on-site in order to achieve a nearly balanced site in terms of earthwork, with nominal (i.e., less than 1,000 cubic yards) soil import and/or export may be required.

As previously discussed, CEQA requires that alternatives be defined based in part on their ability to avoid or reduce the significant impacts of a project. Based on the analysis provided below, the Single Level Parking Facility Alternative would reduce only a few of the proposed project's environmental impacts. Implementation of this Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project, and greater impacts for several issue areas. Nonetheless, the Single Level Parking Facility Alternative has been analyzed herein in response to community concerns regarding the proposed parking facility and building heights under the project. More specifically, public comment has been received in response to both the currently proposed project as well as previous proposals regarding the provision of structured parking on-site, related construction impacts and soil export, and, in the case of the current project, the building heights necessary to accommodate sufficient structured parking while precluding extensive excavation and export.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics, Views, and Light and Glare

Many of the changes in aesthetics, views, and light and glare conditions associated with the proposed project would also occur under the Single Level Parking Facility Alternative due to similarities in the proposals. Construction would occur primarily within previously developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon, the natural vegetation, and most of the existing open space areas. New development would also be compatible in terms of land use, building design, building heights, and site layout to the existing school campus. Visual improvements proposed as part of the project, such as the new landscape plan and central pedestrian walkway/fire road, would also be implemented under this Alternative. Additionally, similar to the project, the Single Level Parking Facility Alternative would require modification of the City's height regulations pursuant to LAMC §12.24F to allow two new buildings to exceed 36 feet, as well as a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F to allow one new building to exceed the maximum 40 feet allowed within the MSPSP Outer Corridor. Nonetheless, the maximum building height for this Alternative would be approximately 10 feet less than the maximum building height associated with the project, and as such, the reduced building heights could be considered somewhat more harmonious with existing development than those of the project. On the other hand, the surface parking areas to be developed throughout the site as part of this Alternative, particularly the large lot at the southern end of the campus, would represent a loss of open space and would detract from the visual character of the campus in comparison with the proposed project.

Most views of the site from off-site locations, including Mulholland Drive, would also be generally similar to those expected with the project. Views of valued visual resources such as canyon vegetation and the Santa Susana Mountains to the north would not be obstructed. However, views of the surface parking areas would be considered degraded relative to comparable views associated with the project. Additionally, automobiles parked in the surface parking lots would serve as potential sources of additional light and glare.

Overall, aesthetics impacts associated with the Single Level Parking Facility Alternative would be greater and less beneficial than the project due to the loss of open space and areas of new surface parking, but such impacts would still be less than significant. Impacts to views, light and glare would be less than significant and generally similar to the project. The potential aesthetic impacts of construction would be significant but temporary, similar to the project, due to the visual discord created by the temporary modular classroom units to be utilized during construction.

b. Air Quality

Under the Single Level Parking Facility Alternative, the parking facility would be built as a single level enclosed structure as opposed to two levels. Although the parking facility size would be reduced, this Alternative would require a similar amount of excavation and grading as the proposed project, since the building would sit at the same elevation as proposed for the project. Thus, localized PM_{10} impacts under this Alternative would be similar to those expected under the project and would result in a significant short-term localized construction impact. Regional construction emissions would also be similar to the project and would be significant, albeit short-term in nature.

With regard to operational air quality impacts, a similar amount of natural gas and electricity would be consumed under this Alternative since the square footage of development under this Alternative would be similar to the square footage proposed for the project. Furthermore, campus operations under the Alternative would be similar to those proposed under the project, in that all of the academic improvements contemplated for the project would be implemented and student enrollment would be increased to 830 students. As such, operational stationary source emissions would be similar when compared to the project. Regional and localized mobile source emissions for this Alternative would also be generally equivalent to the project given the similarity in the traffic levels that would be generated and the amount of parking to be provided. Overall, operation of this Alternative would not violate any air quality standards, contribute to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, or generate odors that result in a nuisance. As with the project, no significant air quality impacts would occur during operation of this Alternative.

c. Biological Resources

Impacts to biological resources expected under the Single Level Parking Facility Alternative would be similar to those associated with the proposed project due to similarities in the proposals. Development would be generally constructed within areas that have been previously developed and/or landscaped, thus limiting impacts to trees and natural plant communities to the extent feasible. However, additional trees may be removed as part of the Alternative to accommodate the surface parking lot in the southern portion of the campus. In any case, the removal of native oak and walnut trees and impacts to nesting birds would be potentially significant, though mitigable, similar to the project. Given the lack of sensitive species on the project site and the existing developed nature of the site, the Alternative would not interfere with habitat (directly or indirectly) such that normal species behaviors, wildlife movement, or migration corridors are disturbed to the degree that may diminish the chances for long-term survival of any species, sensitive or otherwise. In summary, impacts to biological resources under the Single Level Parking Facility Alternative would be significant but mitigable and generally equivalent to those associated with the proposed project.

d. Cultural Resources

Impacts to cultural resources expected under the Single Level Parking Facility Alternative would be similar to those associated with the proposed project due to the similarities in earthwork required. Although the project site has been previously disturbed due to grading and/or development, deep excavations or any type of construction-related activities into underlying bedrock may have a high probability of encountering fossil marine vertebrate remains. Therefore, since excavation and construction into the bedrock may be required, development of the Alternative could potentially result in significant adverse impacts associated with the permanent loss of, or loss of access to, a paleontological resource. Impacts would be equivalent to those of the project, and implementation of mitigation measures would such reduce impacts to less than significant levels.

e. Geology

As it relates to the site's geology, the Single Level Parking Facility Alternative would involve similar site design specifications as the proposed project. Specifically, the Alternative would require approximately 15,674 cubic yards of grading and excavation, as well as an estimated 15,674 cubic yards of fill, similar to the project. Thus, like the project, the Alternative would achieve a nearly balanced site in terms of earthwork, with only nominal import/export. Despite the amount of grading necessary, the Alternative would not significantly modify the existing topography, adjacent hillsides, or nearby ridgelines, similar to the project. Also like the project, if contaminated soil is encountered during earth-moving activities, appropriate measures would be taken for the cleanup and/or disposal of the soil. Development would be subject to grading plan review and approval, soil import/export requirements specified in the LAMC, implementation of erosion control measures and Best Management Practices, and construction in accordance with UBC and LAMC to minimize seismic risks. Like the project, with adherence to applicable site preparation and building regulations and standard engineering practices, impacts would be less than significant.

f. Hazards and Hazardous Materials

Construction activities associated with the Single Level Parking Facility Alternative would involve the use of hazardous materials, similar to the project. These materials would be used in accordance with manufacturers' specifications, and as such, impacts would be less than significant, also similar to the project. Demolition of the existing School structures for construction of the Alternative would have the potential to uncover ACMs and lead-based paints. As with the project, compliance with the regulatory framework and appropriate mitigation measures would ensure that impacts would be less than significant. Such impacts related to ACMs and lead-based paint would also be similar to the project.

Campus operations under the Single Level Parking Facility Alternative would involve the use of hazardous materials typical of those used for educational uses (i.e., cleaning solvents, pesticides and fertilizer for landscaping, gasoline, paint, various laboratory chemicals, glazes and small quantities of printing chemicals.). All materials used during operations would be in accordance with manufacturer's specifications, and therefore, impacts regarding the use of hazardous substances would be less than significant, similar to the project.

Additionally, although the Single Level Parking Facility Alternative does not propose any changes at the location of a potential UST within the former bus maintenance garage area (near the existing Transportation Building), due to the potential presence of an inactive UST, like the project, the Alternative could potentially result in significant impacts related to hazards and hazardous materials in this area. Any UST and associated infrastructure encountered would be removed prior to or during construction in compliance with applicable regulatory requirements, which would reduce potential impacts to a less than significant level. Furthermore, the Alternative would not significantly affect the movement of emergency vehicles or cause substantial interference to emergency vehicle access and evacuation routes. With compliance with applicable regulatory requirements regarding emergency access (e.g., Los Angeles City Fire Code), impacts associated with emergency access would be less than significant, also similar to the project.

g. Hydrology

Due to similarities in the proposals, construction impacts related to hydrology resulting from the Single Level Parking Facility Alternative would be generally similar to those associated with the project. During construction, a NPDES general construction permit would be obtained and best management practices (BMPs) and erosion control measures would be implemented to eliminate or reduce pollutant levels in storm water runoff. If contaminated soils are encountered during earth-moving activities, appropriate measures would be taken for the proper cleanup and/or disposal of the soil. Therefore, like the project, construction-related impacts to hydrology and surface water quality associated with the Alternative would be less than significant.

The Single Level Facility Alternative would result in a greater amount of impervious surface area than the project due to the development of surface parking within the southern portion of the campus. As such, the Alternative would involve greater surface water runoff flows. However, the modest increase in flow could be accommodated by the 51-inch line serving the site, and the Alternative would not cause flooding during a 50-year storm event that would have the potential to harm people or damage property. In addition, this increase would not substantially increase the amount of surface water in a water body, nor produce a substantial change in the current or direction of water flow. Thus, operational impacts on hydrology resulting from the Single Level Facility Alternative would be less than significant, though greater than those anticipated under the project.

h. Land Use

Land use impacts expected under the Single Level Parking Facility Alternative would be similar to those associated with the proposed project due to similarities in the proposals. This Alternative would include the following discretionary approvals: a new CUP and approval of a parcel map to create two legal lots; a Specific Plan Exception to allow expansion and operation of school facilities for an existing legal non-conforming school (institutional) use in the MSPSP Outer Corridor; a Specific Plan Exception to allow one new building to exceed the maximum 40 feet allowed in MSPSP Outer Corridor; modification of the height regulations pursuant to LAMC §12.24F to allow two new buildings to exceed the maximum 36 feet permitted in a residential hillside zone; and various other approvals also sought under the proposed project. In any case, with these approvals as well as implementation of the project features discussed throughout the EIR (most of which would also be implemented as part of this Alternative), the Single Level Parking Facility Alternative would be consistent with the policies in the Community Plan, LAMC requirements, and regulations set forth in the MSPSP. Overall, the Alternative would also comply with the intent of the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines, as well as regional plans such as the Southern California Association of Governments' Regional Comprehensive Plan and Guide, Southern California Air Quality Management District's Air Quality Management Plan, and the Metropolitan Transport Authority's Congestion Management Plan.

Relative to land use compatibility, the Single Level Parking Facility Alternative would represent the continuation of an existing private school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. Project features designed to complement and respect the residential character of the neighborhood, such as the integration of new construction with the site's existing topography, vegetation, and structures and development of a vehicle queuing area for student drop-off/pick-up, would also be implemented under this Alternative. Construction phasing under this Alternative would be similar to that of the project, with substantial efforts made to limit disruption of classes during the regular school year and minimize impacts on neighbors. Thus, the Single Level Parking Facility Alternative would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

In summary, the Alternative would have less than significant impacts with respect to land use. Such impacts would be similar to those associated with the proposed project.

i. Noise

The Single Level Parking Facility Alternative would involve the same general construction activities and phasing as the proposed project. The amount of earth moving activities, construction equipment, and building locations would also be similar to the proposed project. Therefore, on-site construction-period noise impacts would be significant and equivalent to those associated with the project.

During operations, trip generation would be the same under the Single Level Parking Facility Alternative as under the proposed project. Internal circulation would also be similarly improved over existing conditions (e.g., with the new arrival plaza and associated pick-up/drop-off area), but would be somewhat less efficient in comparison with the proposed project due to the need for access to the southern portion of the site. Specifically, in addition to access from

Stansbury Avenue, substantial use of the Camino de la Cumbre gate would be necessary, thus generating traffic noise along that residential street. Roadway traffic noise related to this Alternative would be less than significant, though greater than under the project. Additionally, in comparison to the project, this Alternative would not reduce on-site vehicular activity noise (e.g., car door slams, alarms, etc.) to the same degree, as many vehicles would not be contained in the parking structure. Operational noise levels associated with practices and games on the Athletic Field would be similar to the project and would be less than significant. Noise associated with stationary point sources on-site would be less than significant and somewhat greater than under the project.

j. Transportation and Circulation

The overall duration of construction for the Single Level Parking Facility Alternative would be approximately the same as for the project, with Phase 2 of the Alternative lasting approximately two weeks less than under the project. Construction-related traffic would be generated by construction workers and truck trips delivering materials to the site and removing debris, soil, and other materials from the site. The amount of Phase 2 construction traffic generated by this Alternative would be approximately 9 fewer trips per day (PCE) compared to the project, attributable primarily to fewer construction worker and concrete truck trips. Phase 2 dirt-hauling truck trips associated with nominal import/export would be approximately the same. The construction traffic for the other phases would also be approximately the same as for the project, as would construction traffic patterns under the Alternative. Overall, it is estimated that this Alternative would generate an average of 171 construction trips per day (PCE), compared to an average of 176 construction trips per day (PCE) for the project. In addition, this Alternative would result in increased construction traffic on Camino de la Cumbre during development of the central and southern parking lots.

As with the project, significant construction traffic impacts associated with the Single Level Parking Facility Alternative would occur on Stansbury Avenue south of Valley Vista Boulevard. It is estimated that this Alternative would result in one month less of significant impacts on both a weekday and Saturday (i.e., seven months versus eight months for the project). On Saturday only, there would also be a similar difference, with the Alternative resulting in 32 months of significant impacts compared to 33 months for the project. As under the project, there are no feasible mitigation measures that could reduce construction traffic impacts to levels that are less than significant. Additionally, all construction-related vehicles would be parked or stored in designated areas on-site to the extent possible. As the parking provisions outlined for the project during construction would also be implemented under this Alternative, construction parking impacts would be less than significant.

Relative to School operations, the Single Level Parking Facility Alternative would involve an enrollment increase of 80 students and an associated increase in staffing levels, like the project. As such, this Alternative would result in the same level of trips and would result in the same number of significantly impacted intersections as the proposed project. However, different intersections would be impacted since vehicles would utilize Camino de la Cumbre to access the parking lots located in the southern and central portions of campus. Under this Alternative, the following three intersections would be significantly impacted: (1) Ventura Boulevard and Stansbury Avenue; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard; and (3) Valley Vista Boulevard/Roblar Place and Beverly Glen Boulevard. Implementation of the project's mitigation measures would reduce these significant intersection impacts to levels that are less than significant. While Camino de la Cumbre may experience an increase in vehicle trips due to vehicles traveling along this street to access the central and southern parking lots, impacts to this residential street would be less than significant. Thus, in contrast with the project, this Alternative would result in less than significant impacts to residential streets. In addition, since the baseball playing field would not meet CIF regulation standards and a full-size soccer field could not be accommodated on-site, associated competitions and/or athletic practices would have to occur off-campus, which would involve additional use of buses/shuttles to off-site facilities.

Relative to vehicle queuing, the Alternative would implement the same on-site access and circulation improvements as the project (i.e., the new arrival plaza, space for vehicular and bus queuing, etc.). However, as compared with the project, this Alternative would result in approximately 37 fewer internal queuing spaces, due to the elimination of one level of the parking facility. The Parking Facility would allow queuing space for approximately 32 vehicles (compared to 69 under the project), which would alleviate but not eliminate the queuing on to Stansbury Avenue that occurs under existing conditions. Thus, impacts on access and circulation, while less than significant, would be somewhat greater than the project.

In addition, Congestion Management Program (CMP) impacts would not be significant, since similar to the project, the Alternative would not add 50 or more trips to the two nearby CMP intersections or 150 directional trips on nearby freeways. Impacts relative to emergency access, public transit, pedestrian/bicycle safety, and consistency with the applicable transportation policies of the Community Plan would also be less than significant, like the project. Finally, since the Single Level Parking Facility Alternative would provide 306 parking spaces on-site, the parking supply would be sufficient to meet parking demand. Impacts on parking would be less than significant and equivalent to the project.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

As previously described, the Single Level Parking Facility Alternative would involve all of the academic improvements contemplated for the project, including the proposed increase in student enrollment. As such, the Alternative would meet nearly all of the educational objectives established for the project. Specifically, the Alternative would: modernize instructional space to address the needs of the twenty-first century Buckley student and foster academic excellence; maintain K through 12 educational facilities in a unified campus; create separate dedicated facilities for the athletic, visual arts, and performing arts programs; create modern science facilities and additional classrooms; create state-of-the-art library and technology facilities; provide appropriate instructional space for school programs in order to eliminate inadequacies in the existing educational facilities; accommodate a modest increase in total student enrollment to support Buckley's educational philosophy, enhance curriculum flexibility, and promote high academic standards encompassing a broad curriculum; and introduce an Aquatic Center with an outdoor competition swimming pool. In contrast to the project, however, the Alternative would not improve and maintain all on-site athletic programs, as the presence of surface parking in the southern portion of the campus would impede the configuration and use of the existing baseball and soccer fields, thus requiring the use of off-site facilities for some of the School's athletic programs.

In light of similarities in the proposed campus layout, the Single Level Parking Facility Alternative would also meet most, but not all, of the project's site design and community objectives. The Alternative would: balance cut and fill quantities on-site in order to limit soil import/export and avoid associated impacts; provide facilities that meet modern fire protection, disabled access, and energy efficiency standards; create sufficient on-campus parking to accommodate the vehicles operated by students, parents, and visitors that travel to the site on a regular daily basis; provide a waiting area for students at the same grade as the pick-up/drop-off area within the Parking Facility so as to maximize student safety and the efficiency of the pick-up/drop-off process; phase construction to limit disruption of classes and minimize impacts on neighbors; revise operating conditions to incorporate current City standards for schools and provide clarity to the neighbors; focus the siting of new structures within existing building footprints in order to limit grading and excavation, minimize associated impacts, and retain landscaped and open space areas on-site; concentrate construction within the center of the campus to buffer adjacent residential neighbors from construction activities and school operations; design structures to complement the existing natural topography and minimize impacts to the surrounding hillsides; design structures to be compatible with existing buildings by limiting the roof lines of new buildings to be even with or below the roof line of the existing Disney Pavilion; and upgrade mechanical facilities and improve energy efficiency by centralizing mechanical infrastructure within a Central Plant.

However, this Alternative would not achieve some of the site design and community objectives to the extent that the project would, primarily due to the presence of surface parking in the central and southern portions of the site, the associated need for vehicular access from Camino de la Cumbre, and the loss of queuing space within the parking facility due to its reduced size. These development characteristics would hinder the Alternative's ability to respect the residential character of the surrounding neighborhood to the same extent as the project; contain vehicle queuing and student drop-off/pick-up within the campus; unify the campus and eliminate operational and safety challenges; create a visually unified campus; and reduce hardscape and roadways.

Finally, due to similarities in the proposals, the Single Level Parking Facility Alternative would meet the Community Plan and Specific Plan objectives established for the project. The Alternative would: provide adequately sized educational facilities to serve the needs of the existing and future population, recognizing that the expansion of existing schools is preferable to the acquisition of new school sites; incorporate measures that minimize the impact of noise associated with construction and operation of the School; promote land use compatibility with surrounding uses; ensure that all proposed improvements can be supported by existing and proposed public services and facilities; emphasize a campus layout, building scale, and architectural design that improves the functionality of the campus, is compatible with the character of the surrounding community, and complements the existing structures on-site; preserve and enhance the scenic resources and features found on-site; preserve, complement and enhance views of and across the campus from surrounding hillsides and specifically from Mulholland Drive; and minimize grading and assure graded slopes have a natural appearance compatible with that of the Santa Monica Mountains.

In summary, the Single Level Parking Facility Alternative would achieve most, but not all, of the project's educational objectives and all of the Community Plan and Specific Plan objectives. The Alternative would also meet most, but not all, of the project's site design and community objectives. However, several of the objectives that would not be met to the same extent as the project are considered crucial to the proposal, including containing all vehicle queuing and student drop-off/pick-up within the campus and respecting the residential character of the surrounding neighborhood.

1. DESCRIPTION OF THE ALTERNATIVE

The No Parking Facility Alternative (Alternative D) assumes that the proposed project improvements to academic facilities at the Buckley School would be implemented. As with the project, a net addition of approximately 69,500 square feet of building area would be developed, resulting in a total of 168,650 square feet of educational facilities within the site. However, under the No Parking Facility Alternative, the proposed enclosed Parking Facility would not be developed as part of the Middle and Upper School Main Academic Center. As shown in the site plan provided in Figure V-3 on page 423, approximately 306 parking spaces would be provided on-site in surface lots located throughout the campus. In addition to changes in campus parking and internal circulation, several of the improvements to campus athletic facilities, school operations, and the site's aesthetic character that are proposed as part of the project would not be implemented under this Alternative. However, all of the academic improvements contemplated under the project would be implemented under the No Parking Facility Alternative, including the proposed increase in student enrollment.

Under the No Parking Facility Alternative, surface parking would include two primary surface parking lots at the northern and southern ends of the campus, as well as two smaller parking lots near the Camino de la Cumbre gate. As shown in the site plan, this Alternative would not permit the reconfiguration of the northern parking area, nor would it involve circulation improvements to the drop-off/loading area.[162] As under existing conditions, vehicle queuing on-site would be constrained, and it is likely that queuing on to Stansbury Avenue would continue. The No Parking Facility Alternative would also require substantial use of the Camino de la Cumbre entrance as a primary access point to the parking areas in the central and southern portions of the campus (which collectively would provide approximately 188 of the total 306 parking spaces under this Alternative).

Aspects of the proposed project that would be implemented under this Alternative include: the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces; a new Aquatic Center, Central Plant, and renovation of various

[162] *Given the current configuration of the campus entrance and drop-off/loading area, substantial improvements to circulation and queuing could only be achieved with the removal of existing parking spaces and/or existing landscaping on-site, or with potential conflicts between busses and private vehicles.*

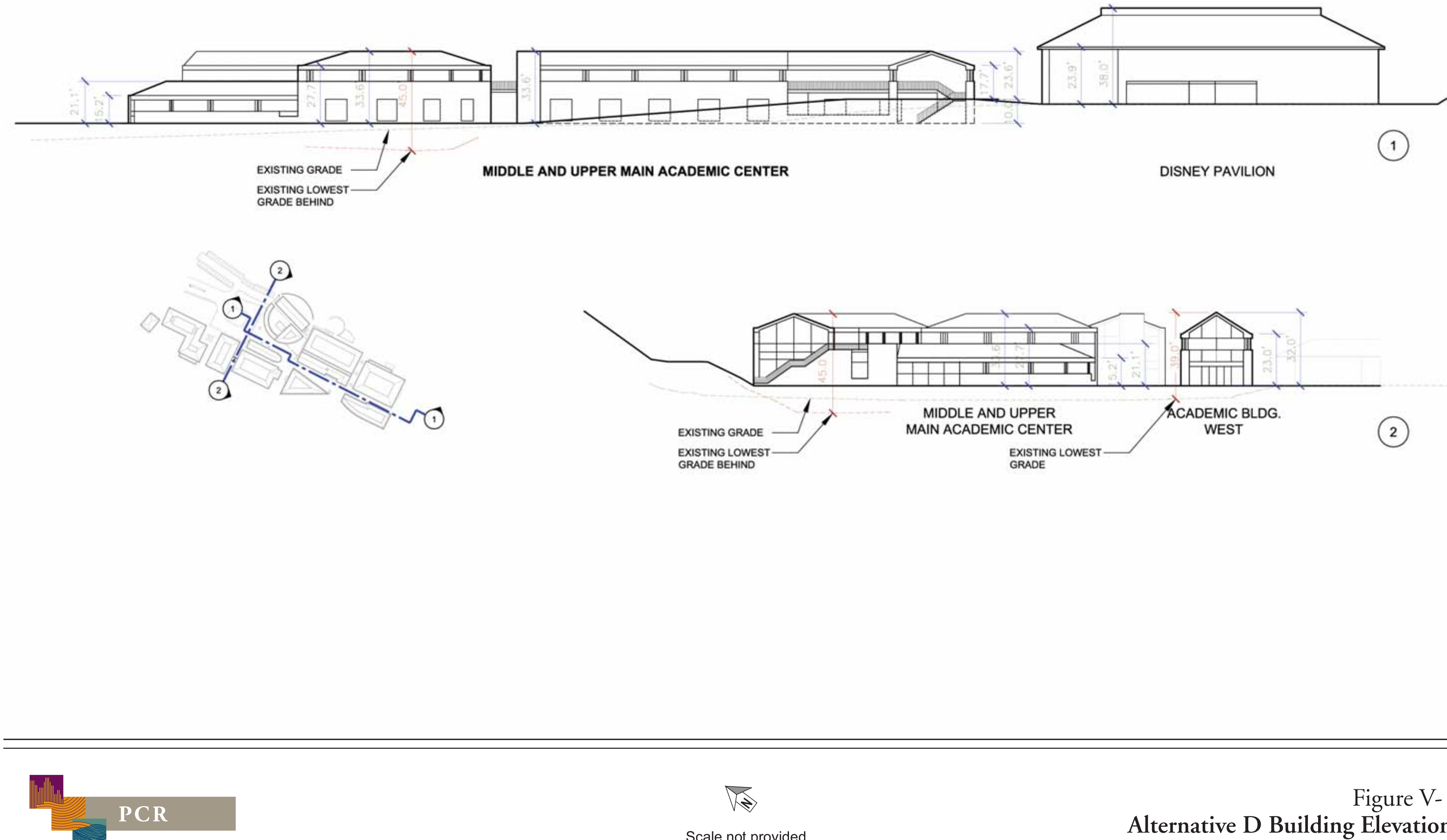
Source: Jeffrey M. Kalban and Associates Architecture, Inc., 2006.

Figure V-3
Alternative D Site Plan

existing buildings; project design elements such as the integration of new construction with existing topography, vegetation, and structures; the proposed central pedestrian walkway/fire road for emergency access; implementation of a landscape plan (albeit somewhat reduced in nature as compared to the project due to the increase in surface parking), including landscaped courtyards and walkways throughout the campus, the introduction of trees alongside several new and existing buildings, and the turtle pond adjacent to the Middle and Upper School Main Academic Center; changes in student and staffing levels as well as campus hours of operation; and approval of various actions and permits. Project elements that would not be introduced under the No Parking Facility Alternative would include beneficial circulation improvements, limitations on use of the Camino de la Cumbre gate, the new basketball court southwest of the Academic Building South, the landscaped grove along the main entrance drive, and additional greening of the athletic field. In addition, due to the need for substantial surface parking at the south end of campus, the baseball playing field would not meet CIF regulation standards and a full-size soccer field (which exists under existing conditions) could not be accommodated. As a result, associated athletic programs, practices, and competitions would have to occur off-site, thus requiring the shuttling of students to off-campus facilities and causing disruptions to the School's regular athletic program.

As shown in Figure V-4 on page 425, given the height of the Middle and Upper School Main Academic Center, maximum building heights under the No Parking Facility Alternative would be 45 feet from existing grade, based on the LAMC definition of building height.[163] As such, like the project, this Alternative would require a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F to allow one new building to exceed the maximum 40 feet allowed within the MSPSP Outer Corridor, as well as a modification of the height regulations pursuant to LAMC §12.24F to allow two new buildings to exceed the maximum 36 feet permitted in a residential hillside zone as established by LAMC §12.21A 17(c). The Main Academic Center, however, would visually appear no greater than 33.6 feet in height from all vantage points due to the sloping nature of the site's topography and grade changes proposed as part of the Alternative. A building height of 45 feet and related changes in finished grade would be necessary to accommodate the excavated soils on-site and eliminate the need for soil export. In any event, all of the new structures would have heights that are generally similar to existing

[163] *Per LAMC §12.03, building height is defined as "the vertical distance above grade measured to the highest point of the roof, structure, or the parapet wall, whichever is highest. Retaining walls shall not be used for the purpose of raising the effective elevation of the finished grade for purposes of measuring the height of a building or structure." Also per LAMC §12.03, grade or adjacent ground level is defined as "the lowest point of elevation of the finished surface of the ground, paving or sidewalk within the area between the building and the property line, or when the property line is more than 5 feet from the building, between the building and a line 5 feet from the building." The proposed building heights referenced throughout this analysis each include a two-foot mansard roof and thus reflect the highest point of the roof, per LAMC §12.03. On each of the proposed buildings, rooftop mechanical equipment will extend approximately seven feet above the high point of the roofline. Such rooftop equipment would not count towards building height, per LAMC §12.21.1 B 3.*



Source: Jeffrey M. Kalban and Associates Architecture, Inc., 2006.

Figure V- 4
Alternative D Building Elevations

building heights on-site, and no proposed roofline within the Main Academic Campus would occur above that of the existing Disney Pavilion, similar to the project.[164]

The total construction period under this Alternative would be somewhat shorter than that of the project, due to elimination of the enclosed Parking Facility. Specifically, Phase 2 of construction would be two months shorter than under the project. The general phasing of construction, however, would be similar to the project (i.e., three phases with the respective applicable building components). The modular classroom units or bungalows to be utilized during project construction would be temporarily located on a portion of the athletic field as well as in a small area immediately north of the Academic Building South for school use during construction of this Alternative. The No Parking Facility Alternative would require roughly 15,674 cubic yards of grading, similar to the project, and it is assumed that all cut materials would be used on-site as fill to limit the need for export. However, an estimated 15,815 cubic yards of soil import would also be necessary to prepare the building pad for the Middle and Upper School Main Academic Center.

As previously discussed, CEQA requires that alternatives be defined based in part on their ability to avoid or reduce the significant impacts of a project. Based on the analysis provided below, the No Parking Facility Alternative would not reduce any of the proposed project's environmental impacts. Implementation of this Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project, and greater impacts for several issue areas. Nonetheless, the No Parking Facility Alternative has been analyzed herein in response to community concerns regarding the proposed parking facility and building heights under the project. More specifically, public comment has been received in response to both the currently proposed project as well as previous proposals regarding the provision of structured parking on-site, related construction impacts and soil export, and, in the case of the current project, the building heights necessary to accommodate sufficient structured parking while precluding extensive excavation and export.

[164] *It is noted that two existing buildings (one of which would be removed as part of the Alternative) have legally non-conforming building heights that exceed above the maximum 36-foot height limit for a residential hillside zone set forth by LAMC Section §12.21A 17(c); however, such buildings comply with the 40-foot height limitation set forth by the Mulholland Specific Plan Section 6D. Additionally, due to the higher elevation of Gilley Field relative to the Main Academic Campus, the existing and proposed buildings within Gilley Field would have rooflines higher than that of the Disney Pavilion, despite lower building heights.*

2. ENVIRONMENTAL IMPACTS

a. Aesthetics, Views, and Light and Glare

Many of the changes in aesthetics, views, and light and glare conditions associated with the proposed project would also occur under the No Parking Facility Alternative due to similarities in the proposals. Construction would occur primarily within previously developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon, the natural vegetation, and most of the existing open space areas. New development would also be compatible in terms of land use, building design, building heights, and site layout to the existing school campus. Some of the visual improvements proposed as part of the project, such as elements of a new landscape plan (albeit somewhat reduced in nature as compared to the project due to the increase in surface parking) and the central pedestrian walkway/fire road, would also be implemented under this Alternative. Additionally, similar to the project, the No Parking Facility Alternative would require modification of the City's height regulations pursuant to LAMC §12.24F to allow two new buildings to exceed 36 feet, as well as a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F to allow one new building to exceed the maximum 40 feet allowed within the MSPSP Outer Corridor. Nonetheless, the maximum building height for this Alternative would be approximately 10 feet less than the maximum building height associated with the project, and as such, the reduced building heights could be considered somewhat more harmonious with existing development than those of the project. However, project landscape improvements in the northern part of the campus would not be implemented, as this Alternative would retain the northern surface parking lot. Furthermore, the new surface parking areas to be developed throughout the site as part of this Alternative, particularly the large lot at the southern end of the campus, would represent a substantial loss of open space and would detract from the visual character of the campus in comparison with the proposed project.

Most views of the site from off-site locations, including Mulholland Drive, would be generally similar to those expected with the project. Views of valued visual resources such as canyon vegetation and the Santa Susana Mountains to the north would not be obstructed. However, views of the surface parking areas would be considered degraded relative to comparable views associated with the project. Additionally, automobiles parked in the surface parking lots would serve as potential sources of additional light and glare.

Overall, aesthetics impacts associated with the No Parking Facility Alternative would be greater and less beneficial than the project, and such impacts would be significant due to the loss of open space and the substantial surface parking located throughout the site. Impacts to views, light and glare would be less than significant and somewhat greater than the project. The potential aesthetic impacts of construction would be significant but temporary, similar to the project, due to the visual discord created by the temporary modular classroom units to be utilized during construction.

b. Air Quality

The No Parking Facility Alternative would involve a similar amount of earthwork as the project despite elimination of the parking facility. However, an estimated 15,815 cubic yards of soil import would be necessary to prepare the building pad for the Middle and Upper School Main Academic Center, thus requiring additional haul truck trips. Even with consideration of the soil import required, overall emissions under this Alternative would be similar to the proposed project due to similarities in the grading work performed and the equipment mix utilized. Localized PM_{10} emissions under this Alternative would be similar to those expected under the project and would result in a short-term, significant local construction impact. Regional construction emissions would also be similar to the project and would be significant, albeit short-term in nature.

With regard to operational air quality impacts, a similar amount of natural gas and electricity would be consumed under this Alternative since the square footage of development under this Alternative would be similar to the square footage proposed by the project. Additionally, similar to the project, student enrollment would be increased to 830 students for this Alternative. As such, operational stationary source emissions would be similar when compared to the project. Regional and localized mobile source emissions for this Alternative would also be generally equivalent to the project given the similarity in the traffic levels that would be generated and the total amount of parking to be provided on-site. Overall, operation of this Alternative would not violate any air quality standards, contribute to an existing or projected air quality violation, expose sensitive receptors to substantial pollutant concentrations, or generate odors that result in a nuisance. Therefore, air quality impacts associated with school operations under the No Parking Facility Alternative would be similar to those of the project and less than significant.

c. Biological Resources

Impacts to biological resources expected under the No Parking Facility Alternative would be similar to those associated with the proposed project due to similarities in the proposals. Development would be generally constructed within areas that have been previously developed and/or landscaped, thus limiting impacts to trees and natural plant communities to the extent feasible. However, additional trees may be removed as part of the Alternative to accommodate the surface parking lot in the southern portion of the campus. In any case, the removal of native oak and walnut trees and impacts to nesting birds would be potentially significant, though mitigable, similar to the project. Given the lack of sensitive species on the project site and the existing developed nature of the site, the Alternative would not interfere with habitat (directly or indirectly) such that normal species behaviors, wildlife movement, or migration corridors are disturbed to the degree that may diminish the chances for long-term survival of any species, sensitive or otherwise. In summary, impacts to biological resources under the No Parking Facility Alternative would be significant but mitigable and generally equivalent to those associated with the proposed project.

d. Cultural Resources

Impacts to cultural resources expected under the No Parking Facility Alternative would be similar to those associated with the proposed project due to similarities in the proposals and the amount of earthwork required. Although the project site has been previously disturbed due to grading and/or development, deep excavations or any type of construction-related activities into underlying bedrock may have a high probability of encountering fossil marine vertebrate remains. Therefore, since some buildings would be supported on drilled concrete piles that may penetrate into the underlying bedrock, development of the Alternative could potentially result in significant adverse impacts associated with the permanent loss of, or loss of access to, a paleontological resource. Impacts would be equivalent to those of the project, and implementation of mitigation measures would such reduce impacts to less than significant levels.

e. Geology

As it relates to the site's geology, the No Parking Facility Alternative would involve similar site design specifications as the proposed project. The Alternative would require roughly 15,674 cubic yards of grading like the project, nearly all of which, it is assumed, would be used as fill material elsewhere within the site. In addition, an estimated 15,815 cubic yards of soil import would be necessary to prepare the building pad for the Middle and Upper School Main Academic Center. The Alternative would not significantly modify the existing topography, adjacent hillsides, or nearby ridgelines, similar to the project. Also like the project, if contaminated soil is encountered during earth-moving activities, appropriate measures would be taken for the cleanup and/or disposal of the soil. Development would be subject to grading plan review and approval, soil import/export requirements specified in the LAMC, implementation of erosion control measures and Best Management Practices, and construction in accordance with UBC and LAMC to minimize seismic risks. Thus, like the project, with adherence to applicable site preparation and building regulations and standard engineering practices, impacts would be less than significant.

f. Hazards and Hazardous Materials

Construction activities associated with the No Parking Facility Alternative would involve the use of hazardous materials, similar to the project. These materials would be used in accordance with manufacturers' specifications, and as such, impacts would be less than significant, also similar to the project. Demolition of the existing School structures for construction of the Alternative would have the potential to uncover ACMs and lead-based paints. As with the project, compliance with the regulatory framework and appropriate mitigation measures would ensure that impacts would be less than significant under this Alternative. Such impacts related to ACMs and lead-based paint would also be similar to the project.

Campus operations under the No Parking Facility Alternative would involve the use of hazardous materials typical of those used for residential uses (i.e., cleaning solvents, pesticides and fertilizer for landscaping, gasoline, paint, various laboratory chemicals). All materials used during operations would be in accordance with manufacturer's specifications, and therefore, impacts regarding the use of hazardous substances would be less than significant, similar to the project.

Additionally, although the No Parking Facility Alternative does not propose any changes at the location of a potential UST within the former bus maintenance garage area (near the existing Transportation Building), due to the potential presence of an inactive UST, like the project, the Alternative could potentially result in significant impacts related to hazards and hazardous materials in this area. Any UST and associated infrastructure encountered would be removed prior to or during construction in compliance with applicable regulatory requirements, which would reduce potential impacts to a less than significant level. Furthermore, the Alternative would not significantly affect the movement of emergency vehicles or cause substantial interference to emergency vehicle access and evacuation routes. With compliance with applicable regulatory requirements regarding emergency access (e.g., Los Angeles City Fire Code), impacts associated with emergency access would be less than significant, also similar to the project.

g. Hydrology

Due to similarities in the proposals, construction impacts related to hydrology resulting from the No Parking Facility Alternative would be generally similar to those associated with the project. During construction, a NPDES general construction permit would be obtained and BMPs and erosion control measures would be implemented to eliminate or reduce pollutant levels in storm water runoff. If contaminated soils are encountered during earth-moving activities, appropriate measures would be taken for the proper cleanup and/or disposal of the soil.

Therefore, like the project, construction-related impacts to hydrology and surface water quality associated with the Alternative would be less than significant.

The No Parking Facility Alternative would result in a greater amount of impervious surface area than the project due to retention of the existing northern parking lot and the development of surface parking within the southern portion of the campus. As such, the Alternative would involve greater surface water runoff flows. However, the modest increase in flow could be accommodated by the 51-inch line serving the site, and the Alternative would not cause flooding during a 50-year storm event that would have the potential to harm people or damage property. In addition, this increase would not substantially increase the amount of surface water in a water body, nor produce a substantial change in the current or direction of water flow. Thus, operational impacts on hydrology resulting from the No Parking Facility Alternative would be less than significant, though greater than those anticipated under the project.

h. Land Use

Land use impacts expected under the No Parking Facility Alternative would be similar to those associated with the proposed project due to similarities in the proposals. This Alternative would include the following discretionary approvals: a new CUP and approval of a parcel map to create two legal lots; a Specific Plan Exception to allow expansion and operation of school facilities for an existing legal non-conforming school (institutional) use in the MSPSP Outer Corridor; a Specific Plan Exception to allow one new building to exceed the maximum 40 feet allowed in MSPSP Outer Corridor; modification of the height regulations pursuant to LAMC §12.24F to allow two new buildings to exceed the maximum 36 feet permitted in a residential hillside zone; and various other approvals also sought under the proposed project. In any case, with the approvals as well as implementation of the project features discussed throughout the EIR (most of which would also be implemented as part of this Alternative), the No Parking Facility Alternative would be consistent with the policies in the Community Plan, LAMC requirements, and regulations set forth in the MSPSP. Overall, the Alternative would also comply with the intent of the Mulholland Scenic Parkway Specific Plan Design and Preservation Guidelines, as well as regional plans such as the Southern California Association of Governments' Regional Comprehensive Plan and Guide, Southern California Air Quality Management District's Air Quality Management Plan, and the Metropolitan Transport Authority's Congestion Management Plan.

Relative to land use compatibility, the No Parking Facility Alternative would represent the continuation of an existing private school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. Most of the project features designed to complement and respect the residential character of the neighborhood, such as the integration of new construction with the site's existing topography, vegetation, and structures, would also be implemented under this Alternative. Construction phasing under this Alternative would be similar to that of the project, with substantial efforts made to limit disruption of classes during the regular school year and minimize impacts on neighbors. However, compatibility relative to queuing on Stansbury Avenue would be reduced in comparison to the project as the access and queuing improvements achieved with the proposed parking facility and arrival plaza would not occur under this Alternative. Nonetheless, overall the No Parking Facility Alternative would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

In summary, the Alternative would have less than significant impacts with respect to land use. Such impacts would be similar to those associated with the proposed project.

i. Noise

While the duration of construction would be shortened by two months under the No Parking Facility Alternative, the amount of grading, earth moving activities, construction equipment, and building locations would be similar that associated with the proposed project. Therefore, on-site construction noise impacts would be equivalent to those associated with the project and significant. In addition, an increased number of truck trips would be required to import soil for the Main Academic Center building pad. Noise impacts along haul truck routes (e.g., Stansbury Avenue) would thus be greater under this Alternative as compared to the proposed project. As with the project, construction noise impacts would be significant, albeit short-term in nature.

As it relates to noise, campus operations associated with the No Parking Facility Alternative would also be similar to those of the proposed project. Specifically, as the No Parking Facility Alternative would increase enrollment to 830 students, trip generation would be the same as under the proposed project. However, internal circulation would differ from the proposed project. While some vehicles would still travel to the northern parking lot via the same driveway entrance and exit configuration as the proposed project, other vehicles would travel to the surface parking lots in the central and southern portions of the campus via the gate on Camino de la Cumbre, thus generating traffic noise along that residential street. As such,, roadway traffic noise related to this Alternative would be greater than under the project, though still less than significant (with mitigation). Furthermore, in comparison to the project, this Alternative would not reduce on-site vehicular activity noise (e.g., car door slams, alarms, etc.) since vehicles would not be contained in an enclosed parking structure. Operational noise levels associated with athletic team practices and games would also be similar to project and would be less than significant. In summary, noise associated with stationary point sources on-site would be less than significant and somewhat greater than under the project.

j. Transportation and Circulation

As described above, the No Parking Facility Alternative would involve the same general construction activities and phasing as the proposed project. Within this period, it is expected that Phase 2 of the Alternative would be completed in approximately two months less time than under the project. Construction-related traffic would be generated by construction workers and truck trips delivering materials to the site and removing debris, soil, and other materials from the site. During Phase 2, this Alternative would generate less construction worker and concrete trips, but more dirt-hauling truck trips due to the need for soil import. However, due to Phase 2 of the Alternative occurring over a shorter time period as compared to the project, there would be an average of 3 more construction trips per day (PCE) generated by this Alternative than by Phase 2 of the project. For the other construction phases of this Alternative, construction traffic would be the same as for the project. It is expected that construction traffic patterns would also be the same. Overall considering all phases of construction, the No Parking Facility Alternative would average approximately 175 construction trips per day (PCE), or nearly the same as the average of 176 construction trips per day (PCE) for the project. In addition, this Alternative would result in increased construction traffic on Camino de la Cumbre during construction of the southern and central parking lots.

Significant construction traffic impacts attributable to the No Parking Facility Alternative would only occur on Stansbury Avenue south of Valley Vista Boulevard, similar to the project. The Alternative would have approximately nine months of significant impacts on both a weekday and a Saturday, or one month more than the project. This Alternative would result in 31 months of significant impacts on Saturday only, or two months less than the project. As under the project, there are no feasible mitigation measures that could reduce construction-traffic impacts to levels that are less than significant. Additionally, all construction-related vehicles would be parked or stored in designated areas on-site to the extent possible. Although a parking facility would not be constructed to accommodate construction parking, the existing and proposed surface parking lots would essentially serve the same purpose, and the School would make interim operational changes as necessary to accommodate parking needs. Since most of the parking provisions outlined for the project during construction would also be implemented under this Alternative, construction parking impacts would be less than significant.

Relative to School operations, the No Parking Facility Alternative would involve an enrollment increase of 80 students and an associated increase in staffing levels, like the project. As such, this Alternative would result in the same level of trips and would result in the same number of impacted intersections as the proposed project. However, slightly different locations within the street system would be impacted, as vehicles would utilize Camino de la Cumbre to access various parking lots located at the southern and central portions of campus. Under this Alternative, the following three intersections would be significantly impacted: (1) Ventura Boulevard and Stansbury Avenue; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard; and (3) Valley Vista Boulevard/Roblar Place and Beverly Glen Boulevard. Implementation of the project's mitigation measures would reduce these significant intersection impacts to levels that are less than significant. Also like the project, one residential street segment would be significantly impacted. However, in contrast with the project, this impact would occur on Camino de la Cumbre south of Valley Vista. Mitigation would reduce impacts at this street segment to a less than significant level. In addition, since the baseball playing field would not meet CIF regulation standards and a full-size soccer field could not be accommodated on-site, associated competitions and/or athletic practices would have to occur off-campus, which would involve additional use of buses/shuttles to off-site facilities.

Relative to vehicle queuing, the No Parking Facility Alternative would not involve reconfiguration of the main entry drive and arrival plaza, and the project's on-site access and circulation improvements would not be achieved. This Alternative would not provide the opportunity to safely drop-off and pick-up nearly as many students at one time as the proposed project. Vehicle queuing during the student drop-off/pick-up periods would continue to be constrained, as under existing conditions. Given the increase in student and staffing levels that would occur and the associated increase in trip generation, the current queuing onto Stansbury Avenue would likely be exacerbated. Since queuing impacts associated with school operations would be considered significant if on-street queuing regularly interfered with traffic flow more than under existing circumstances, queuing impacts associated with the No Parking Facility Alternative would be significant. Such impacts would be increased as compared with the project.

Under the No Parking Facility Alternative, CMP impacts would not be significant, since similar to the project, the Alternative would not add 50 or more trips to the two nearby CMP intersections or 150 directional trips on nearby freeways. Impacts relative to emergency access, public transit, pedestrian/bicycle safety, and consistency with the applicable transportation policies of the Community Plan would also be less than significant, like the project. Finally, the No Parking Facility Alternative would provide 118 parking spaces at the existing main parking lot and 188 parking spaces located within parking lots at the southern and central portions of the site. Since the No Parking Facility Alternative would provide 306 parking spaces on-site, the parking supply would be sufficient to meet parking demand. Impacts on parking would be less than significant and equivalent to the project.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

As previously described, the No Parking Facility Alternative would involve all of the academic improvements contemplated for the project, including the proposed increase in student enrollment. As such, the Alternative would meet nearly all of the educational objectives established for the project. Specifically, the Alternative would: modernize instructional space to address the needs of the twenty-first century Buckley student and foster academic excellence; maintain K through 12 educational facilities in a unified campus; create separate dedicated facilities for the athletic, visual arts, and performing arts programs; create modern science facilities and additional classrooms; create state-of-the-art library and technology facilities; provide appropriate instructional space for school programs in order to eliminate inadequacies in the existing educational facilities; accommodate a modest increase in total student enrollment to support Buckley's educational philosophy, enhance curriculum flexibility, and promote high academic standards encompassing a broad curriculum; and introduce an Aquatic Center with an outdoor competition swimming pool. In contrast to the project, however, the Alternative would not improve and maintain all on-site athletic programs, as the presence of surface parking in the southern portion of the campus would impede the configuration and use of the existing baseball and soccer fields, thus requiring the use of off-site facilities for some of the School's athletic programs.

In light of similarities in the proposed campus layout, the No Parking Facility Alternative would also meet many, but not all, of the project's site design and community objectives. The Alternative would: provide facilities that meet modern fire protection, disabled access, and energy efficiency standards; create sufficient on-campus parking to accommodate the vehicles operated by students, parents, and visitors that travel to the site on a regular daily basis; phase construction to limit disruption of classes and minimize impacts on neighbors; revise operating conditions to incorporate current City standards for schools and provide clarity to the neighbors; focus the siting of new structures within existing building footprints in order to limit grading and excavation and minimize associated impacts; concentrate construction within the center of the campus to buffer adjacent residential neighbors from construction activities and school operations; design structures to complement the existing natural topography and minimize impacts to the surrounding hillsides; design structures to be compatible with existing buildings by limiting the roof lines of new buildings to be even with or below the roof line of the existing Disney Pavilion; and upgrade mechanical facilities and improve energy efficiency by centralizing mechanical infrastructure within a Central Plant.

However, this Alternative would not meet achieve many of the project's site design and community objectives, primarily due to the parking configuration. With no structured parking, no reconfigured arrival plaza, the lack of sufficient queuing space, the presence of surface parking in the central and southern portions of the site, and the associated need for vehicular access from Camino de la Cumbre, the No Parking Facility Alternative would not have the same beneficial effects on access, circulation, queuing, and safety as the project. These development characteristics would hinder the Alternative's ability to respect the residential character of the surrounding neighborhood to the same extent as the project; contain vehicle queuing and student drop-off/pick-up within the campus; provide a waiting area for students at the same grade as the pick-up/drop-off area within the Parking Facility so as to maximize student safety and the efficiency of the pick-up/drop-off process; unify the campus and eliminate operational and safety challenges; create a visually unified campus; reduce hardscape and roadways; and retain landscaped and open space areas on-site. Furthermore, the soil import required by this Alternative would preclude the ability to balance cut and fill quantities on-site in order to limit soil import/export and avoid associated impacts.

Finally, due to similarities in the proposals, the No Parking Facility Alternative would meet the Community Plan and Specific Plan objectives established for the project, though not necessarily to the same extent. The Alternative would: provide adequately sized educational facilities to serve the needs of the existing and future population, recognizing that the expansion of existing schools is preferable to the acquisition of new school sites; promote land use compatibility with surrounding uses; ensure that all proposed improvements can be supported by existing and proposed public services and facilities; emphasize a campus layout, building scale, and architectural design that improves the functionality of the campus, is compatible with the character of the surrounding community, and complements the existing structures on-site; preserve and enhance the scenic resources and features found on-site; and minimize grading and assure graded slopes have a natural appearance compatible with that of the Santa Monica Mountains. However, the Alternative would not minimize the impact of noise associated with construction and operation of the School to the same extent as the project, nor would it preserve, complement and enhance views of and across the campus from surrounding hillsides and specifically from Mulholland Drive to the same extent due to the retention and introduction of substantial surface parking throughout the campus.

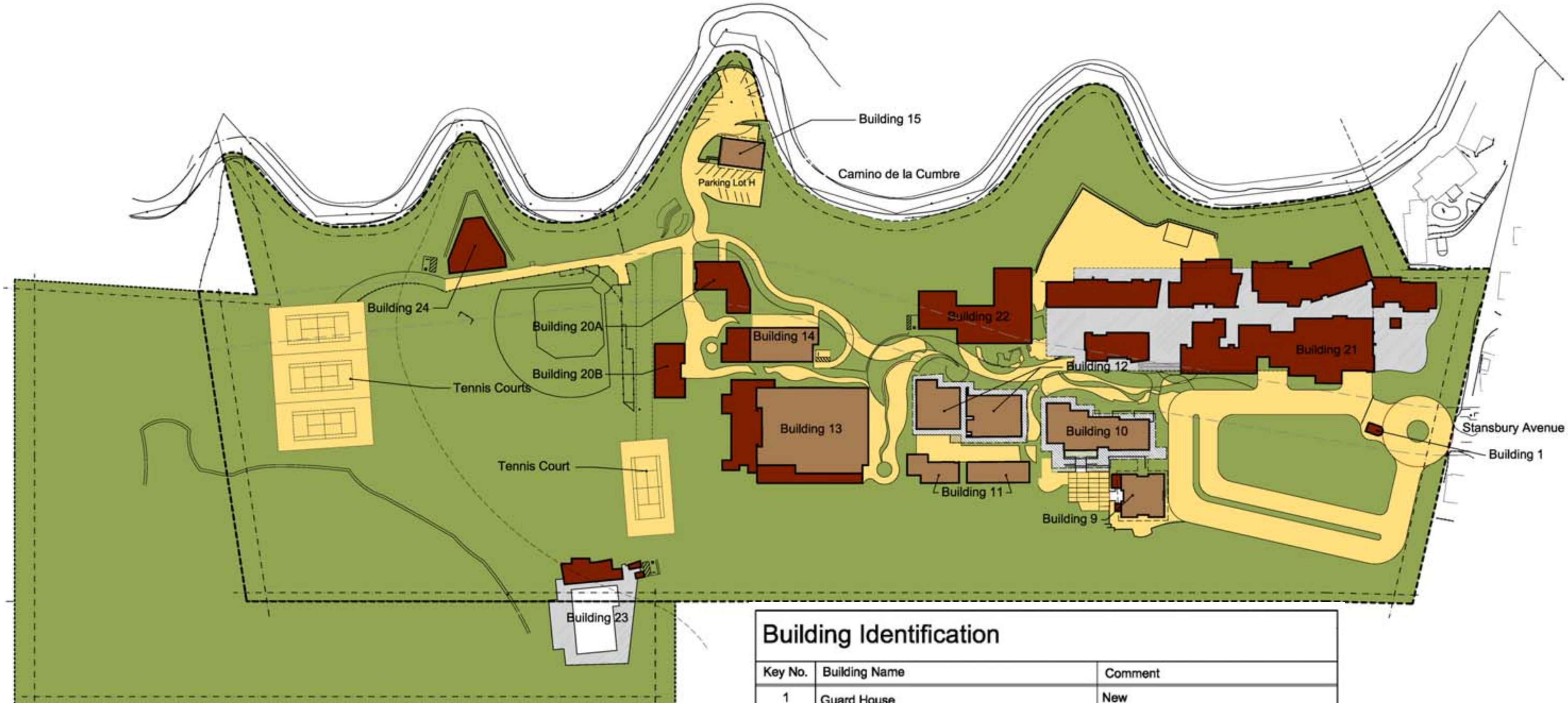
In summary, the No Parking Facility Alternative would achieve many, but not all, of the project's educational objectives and most of the Community Plan and Specific Plan objectives. The Alternative would meet many of the project's site design and community objectives, but due to its access, circulation, and parking configuration, would not achieve several important project objectives.

1. DESCRIPTION OF THE ALTERNATIVE

Under the Previous Project Alternative (Alternative E), a development proposal resembling the plan described in the November 2004 EAF/Draft Initial Study and the Notice of Preparation dated January 12, 2005 would be implemented. Like the proposed project, this Alternative would provide for new teaching space, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The Alternative would also provide for the modernization of existing facilities, improved disabled access, seismic retrofits, and energy efficiency upgrades. The plan would involve the demolition, construction, expansion, and renovation of various buildings on-site (the Lower School buildings in particular), as well as vehicular circulation and queuing improvements and increased parking within a new semi-subterranean parking facility. Upon completion, a net addition of approximately 53,750 square feet of building area would be provided, resulting in a total of 152,900 square feet of educational facilities within the project site. Additionally, a new two-level semi-subterranean parking facility would be constructed beneath the Lower/Middle School Classroom building, providing a total of 306 spaces on-site. Figure V-5 on page 438 shows the conceptual site layout of the Previous Project Alternative.

The following aspects of the proposed project (or comparable improvements) would be implemented under this Alternative: project design elements such as the integration of new construction with the site’s existing topography, vegetation, and structures; introduction of structured parking with a new drop-off/loading area and the elimination of vehicle queuing on Stansbury Avenue; an outdoor swimming pool facility; implementation of a landscape plan, including campus perimeter plantings, a centrally located greenbelt/pedestrian circulation spine, and inner courtyard plantings; modification of the City’s height regulations pursuant to LAMC §12.24F to allow some building heights up to a maximum of 40 feet consistent with the Mulholland Scenic Parkway Specific Plan Section 6D and in lieu of the maximum 36 feet permitted in a residential hillside zone pursuant to LAMC §12.21A 17(c); and approval of various other actions and permits.

Elements of the proposed project that would not be implemented under the Previous Proposal Alternative would include the provision of sufficient dedicated special use and performing arts spaces, the new basketball/play court for physical education and after school sports practice, and most importantly, balanced cut and fill operations during construction.



LEGEND

- - - - - -	Property Line
- - - - - -	Line of Setback
	Existing Building
	Proposed Building
	Overhang / Covered Walk
	Hardscape

Building Identification

Key No.	Building Name	Comment
1	Guard House	New
9	Robert Young Library	Existing to Remain + Addition
10	Administration Building	Existing to Remain
11	Middle School Humanities Building	Existing to Remain
12	Upper School Humanities Building	Existing to Remain
13	Disney Pavilion (Main & 1 Accessory Building)	Existing to Remain + Addition
14	Science and Arts Classroom Building	Existing to Remain
15	Transportation Building	Existing to Remain
20	Science Classroom Building A	New
	Science Classroom Building B	New
21	Garage/ Elementary/ Middle School Building	New
22	Multipurpose/ Dining Hall Building	New
23	Competition Pool	New
24	Field Athletics Building	New

PCR

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Figure V-5
Conceptual Site Layout of Alternative E

Source: Pica & Sullivan Architects, LTD., 2004

Construction of the Previous Project Alternative would occur in three general phases, which each include one or two building components. The subphase components are grouped as a single phase for operational and construction logistics, such as balancing cut and fill materials during a phase, facilitating continued school operation on-site with the sequencing and relocation of classes during construction, and minimizing disruptions to neighbors. The phases are organized as shown on Table V-2 on page 440.

As with the project, primary access to the site would continue to be provided from Stansbury Avenue. The existing main surface parking lot would be replaced with an at-grade drop-off/pick-up area. The center of this area would comprise 21,330 square feet (0.49 acre). All vehicles entering the campus through the Stansbury Avenue entrance would either drive directly to the drop-off/pick-up area or enter directly into the semi-subterranean parking facility. The semi-subterranean parking facility would provide increased capacity for vehicle queuing on campus during student drop-off and pick-up periods, with space for up to 60 vehicles to queue inside both the upper and lower levels of the facility. This would allow the campus area currently used as a surface parking lot to become the student drop-off/pick up area with an appreciably greater area for student loading and unloading, including room for a maximum of approximately 77 vehicles. As a result, there would be on-campus queuing capacity for 137 vehicles under typical conditions. With this increase in on-campus queuing capacity, this Alternative would eliminate the queuing of vehicles currently experienced on Stansbury Avenue.

This Alternative would necessitate approximately 66,700 cubic yards of cut, 15,250 cubic yards of fill, and the export of approximately 51,450 cubic yards, including approximately 48,500 cubic yards for excavation to build the semi-subterranean parking facility. These grading and export numbers would be significantly larger than required under the proposed project wherein grading would require an estimated 15,674 cubic yards of cut, an estimated 15,674 cubic yards of fill, and only nominal (i.e., less than 1,000 cubic yards) soil import/export. Construction phasing under this Alternative would extend over a 7 to 10 year period as opposed to 6 years for the project. Additionally, in contrast to the project, this Alternative would redevelop all of the Lower School structures, provide for four outdoor tennis courts in the southern portion of the athletic field, and eliminate the existing basketball and weight facility.

As previously mentioned, CEQA requires that alternatives be defined in part based on their ability to avoid or reduce the significant impacts of a project. Based on the analysis provided below, the Previous Project Alternative would reduce only a few of the proposed project's impacts. Implementation of this Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project, and greater impacts for several issue areas. Nonetheless, this Alternative has been analyzed here in order to provide an analytical comparison of the development proposal described in the November 2004 EAF/Draft Initial Study and January 12, 2005 NOP with the currently proposed project, which was defined in response to community concerns and input regarding the previous proposal. In particular, the

Table V-2

Previous Project Alternative - Proposed Facilities

Project Phases and Building Components		New Building Area (approx. square feet) [a]
Phase 1		
Subphase 1-A:	New Science Buildings A & B, Science and Arts Classroom Building (Academic Building South) Addition and Renovation, and Disney Pavilion Addition and Renovation (except Second Basement)	20,200
Subphase 1-B:	Replacement Lower/Middle School Classroom Building with the New Semi-Subterranean Parking Facility, and Replacement Guard House	46,200
Phase 2		
Subphase 2-A:	New Multipurpose/Dining Hall Building, and Robert Young Library Addition and Renovation	13,550
Subphase 2-B:	Replacement/New Outdoor Competition Pool, Replacement Field House, Transportation Building Addition, Field Grandstand Removal, and Disney Second Basement Renovation	9,350
Phase 3		
Phase 3:	Middle School Humanities Building Renovation, Upper School Humanities Building Renovation, and Administration Building Renovation	0
Total New Building Area for all Phases		**89,300**
Total Building Area to be Removed		**- 35,550**
Net Area Increase in Building Area		**53,750**
Total Existing Building Area		**+ 99,150**
Total Building Area Upon Completion		**152,900**
Parking		**Spaces**
Semi-Subterranean Parking Facility		277
Various Remaining Surface Parking Spaces throughout Campus		29
Total Number of Parking Spaces on Campus		**306**

[a] *These building area square footage calculations refer to FAR program space and do not include areas such as exterior covered walkways, exterior covered balconies and roof overhangs. These exterior areas are not included in the Los Angeles Planning Code definition of floor area, but may be included in the Building Code definition of floor area.*

project as currently proposed was developed in an effort to address public comments regarding construction impacts and soil export associated with the previous proposal and to reduce related environmental impacts. In general, any greater impacts occurring under the Previous Project Alternative are associated with development characteristics that have been revised as part of the currently proposed project in order to minimize such impacts in response to community concerns.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics, Views, and Light and Glare

Construction would occur primarily within previously developed areas of the campus, thus integrating new structures with existing development and minimizing effects on the slopes of the canyon, the natural vegetation, and most of the existing open space areas. New development would also be compatible in terms of land use, building design, building heights, and site layout to the existing school campus. Visual improvements proposed as part of the project, such as the new landscape plan and central pedestrian walkway/fire road, would also be implemented under this Alternative. Additionally, similar to the project, the Previous Project Alternative would require modification of the City's height regulations pursuant to LAMC §12.24F to allow some building heights to exceed 36 feet. However, with a maximum building height of 40 feet, this Alternative would be consistent with MSPSP height limitations (unlike the project), and the reduced building heights relative to those of the project could be considered somewhat more harmonious with existing development. Overall, aesthetic impacts related to project implementation would be less than significant and would be generally similar to the project.

Most views of the site from off-site locations, including Mulholland Drive, would also be generally similar to those expected with the project. Views of valued visual resources such as canyon vegetation and the Santa Susana Mountains to the north would not be obstructed. Overall, impacts to views as well as light and glare would be less than significant and generally similar to the project.

Under the Previous Project Alternative, new Science Classroom Buildings A and B would be built first during Phase 1-A so that they can be used for Lower School classrooms during the construction of the replacement Lower/Middle School Classroom Building in Sub-Phase 1-B. As such, fewer temporary modular classrooms would be introduced on the athletic field, and construction-related aesthetic impacts would be less than significant. Thus, the project's significant aesthetic impact during construction would be avoided.

b. Air Quality

Due to the extensive amount of earthwork required for construction of the semi-subterranean parking facility, the Previous Project Alternative would result in greater construction emissions than the project. Additionally, due to the need for export, construction-related truck traffic (see discussion below) would be greater. Therefore, construction-related air quality impacts would be significant even with incorporation of mitigation measures, and would be greater than impacts associated with the project.

As with the project, this Alternative would increase student enrollment to 830 students and would provide 306 parking spaces on-site. Thus, projected traffic levels would be identical, and air quality impacts associated with school operations under the Previous Project Alternative would be similar to those of the project and less than significant. Operational impacts related to toxic air contaminants and odor would also be similar to those of the project and less than significant. Additionally, the Alternative would not be expected to conflict with adopted air quality plans and policies, and impacts would be less than significant, similar to the project.

c. Biological Resources

Development of the Previous Project Alternative would primarily occur in areas that have already been developed and graded. Thus, the project would not result in the loss of wildlife individuals, or the reduction of existing habitat, of a local, State or Federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern. Given the lack of sensitive species on the project site and the existing developed nature of the site, the proposed project would not interfere with habitat (directly or indirectly) such that normal species behaviors are disturbed to the degree that may diminish the chances for long-term survival of a sensitive species. Thus, such impacts would be less than significant and would be similar to the project.

Based on the development footprint, the southern tennis courts contemplated under the Previous Project Alternative would impact the jurisdictional drainage located south of the site. While the extent of the impact (in terms of acreage) would be limited enough as to constitute a less than significant impact, impacts relative to jurisdictional drainages would be greater than under project.

Development of the Previous Project Alternative would result in the removal of a total of 46 trees, including 7 native trees (five coast live oak, one California sycamore, and one southern California black walnut) and 39 non-native trees. Thus, impacts to native trees would be reduced when compared with the project. As required by the City's Native Tree Ordinance, the native trees to be removed would be replaced on at least a two-to-one basis. Thus, with mitigation measures, impacts would be less than significant, and would be reduced when compared to the proposed project. Overall, impacts to biological resources would be roughly equivalent to those occurring under the proposed project.

d. Cultural Resources

The Previous Project Alternative would require a greater depth of excavation for construction of the semi-subterranean parking facility as compared with the project. Due to the greater depth of excavation, the Previous Project Alternative would have a higher probability for the accidental discovery of paleontological resources. Therefore, while mitigation measures would also reduce impacts to paleontological resources to less than significant, impacts under the Previous Project Alternative would be somewhat greater than that for the project.

e. Geology

The Previous Project Alternative would necessitate approximately 66,700 cubic yards of cut, 15,250 cubic yards of fill, and the export of approximately 51,450 cubic yards, including approximately 48,500 cubic yards for excavation to build the semi-subterranean Parking Facility. The parking facility, however, would be located within a previously developed area. Finished grades for the Previous Project Alternative would be generally similar to existing grades throughout the site, and prominent ridgelines would not be affected. Thus, the Previous Project Alternative would not significantly modify the existing topography and the adjacent hillsides. Impacts to landform, while less than significant, would be greater than the project due to the greater amount of earthwork required.

As the Previous Project Alternative would require a greater amount of earthwork than the project, the potential for sedimentation and erosion would be greater than for the project. However, implementation of BMPs and other erosion control measures would reduce geological impacts relative to sedimentation and erosion to less than significant levels, and thus impacts would be similar to those for the project.

The Previous Project Alternative would not result in an increased exposure to seismic hazards risks compared to the project. Furthermore, the Previous Project Alternative would be exposed to the same types of seismic hazard risks as the proposed project. Such hazards would be reduced to the extent possible by adherence to regulatory requirements. Thus, potential impacts associated with seismic hazards would be less than significant and similar to the project.

f. Hazards and Hazardous Materials

Construction of the Previous Project Alternative would require the use of potentially hazardous materials, similar to the project. Additionally, operation of the Previous Project Alternative would involve the use of the same types of chemicals currently used on-site. As with the project, the use of all hazardous substances would occur in accordance with applicable regulations and manufacturers' specifications such that hazardous materials impacts would be less than significant. Impacts regarding the use of hazardous substances would be less than significant and would be similar to the project.

Demolition of existing structures would also have the potential to release asbestos-containing materials and to a lesser degree, uncover lead-based paints. As with the project, compliance with the regulatory framework and appropriate mitigation measures would ensure that impacts would be less than significant. The Previous Project's less than significant impacts related to ACMs and lead-based paint would be similar to the project.

Due to the potential presence of an inactive UST and unlikely but possible associated PCE contamination in soils, like the project, the Alternative could potentially result in significant impacts related to hazards and hazardous materials in this area. Any UST and associated piping and contamination encountered would be removed prior to or during construction in compliance with applicable regulatory requirements, which would reduce potential impacts to a less than significant level.

As with the project, emergency access to the site would be provided via Stansbury Avenue and Camino de la Cumbre. In addition, the Previous Project Alternative would also incorporate a new pedestrian walkway sufficient in width to accommodate emergency vehicles. Furthermore, the Previous Project Alternative would improve access to the site and eliminate queuing along Stansbury Avenue. Under the Previous Project Alternative, adequate emergency access would be provided. Thus, impacts to emergency access would be less than significant, and would be similar to the project.

g. Hydrology

Due to similarities in the proposals, construction impacts related to hydrology resulting from the Previous Project Alternative would be generally similar to those associated with the project. During construction, a NPDES general construction permit would be obtained and BMPs and erosion control measures would be implemented to eliminate or reduce pollutant levels in storm water runoff. If contaminated soils are encountered during earth-moving activities, appropriate measures would be taken for the proper cleanup and/or disposal of the soil. Therefore, like the project, construction-related impacts to hydrology and surface water quality associated with the Alternative would be less than significant. Refer to subsection c., Biological Resources, above for discussion of impacts to jurisdictional drainages.

The amount of impervious and pervious areas from development of the Previous Project Alternative would be generally similar to the project.[165] As with the project, an increase in surface water flow would occur that could be accommodated by the 51-inch line serving the site, and the Alternative would not cause flooding during a 50-year storm event that would have the potential to harm people or damage property. In addition, this increase would not substantially increase the amount of surface water in a water body, nor produce a substantial change in the

[165] *Due to the differences in the methodology used to calculate impervious surfaces for the Previous Plan Alternative and the proposed project, a quantitative comparison of hydrological impacts is not available.*

current or direction of water flow. Thus, operational impacts on hydrology resulting from the Previous Project Alternative would be less than significant and similar to those analyzed for the project.

h. Land Use

The Previous Project Alternative would result in similar land use impacts as the project. Development of this Alternative would require the following discretionary approvals: a new CUP; approval of a parcel map to create two legal lots; a Specific Plan Exception to allow expansion and operation of school facilities for an existing legal non-conforming school (institutional) use in the MSPSP Outer Corridor; modification of the height regulations pursuant to LAMC §12.24F to allow some building heights to exceed the maximum 36 feet permitted in a residential hillside zone as established by LAMC §12.21A 17(c); and various other approvals also sought under the proposed project. This Alternative, however, would not require approval of a Specific Plan Exception pursuant to MSPSP Section 3C and LAMC §11.5.7F to allow buildings heights to exceed the maximum 40 feet allowed per the Mulholland Scenic Parkway Specific Plan Outer Corridor, nor would it require a Building Code modification to allow placement of new fill over uncertified fill. In any case, with the necessary approvals, this Alternative would be consistent with the policies in the Community Plan, LAMC requirements, and regulations set forth in the MSPSP. Land use impacts for consistency with regulations would be less than significant and similar to the project.

Land use compatibility impacts would also be similar to the project. This Alternative would represent a continuation of an existing school use and would not introduce new uses that would conflict with or have an adverse impact on surrounding land uses. This alternative would be designed to respect the residential character of the neighborhood, with proposed buildings that would be integrated with the site's existing topography, vegetation, and structures. Additionally, relative to vehicular circulation, the project would include access and circulation improvements to contain vehicle queuing for student drop-off/pick-up within the campus in order to keep this activity off of Stansbury Avenue and would provide a semi-subterranean parking facility to meet the parking demands of the school. Thus, the Previous Project Alternative would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation. Overall, land use compatibility would be less than significant and similar to the project.

i. Noise

The Previous Project Alternative would involve the same type of construction activities as the project and would require the use of mobile heavy equipment with high noise level characteristics throughout the site over the course of several time periods. Similar to the project, the average construction-period noise level would exceed the 5 A-weighted decibel (dBA) significance threshold at multiple sensitive receptor locations. In addition, haul trucks, delivery trucks, and construction workers would require access to the site throughout the construction duration, thus generating construction-related roadway noise. Overall, construction-period noise impacts would be significant. As this Alternative would require a longer construction time frame than the proposed project (one to four years longer) and would require more extensive earthwork and truck trips, construction-noise impacts would be greater when compared to those associated with the project.

The Previous Project Alternative proposes the same increase in student enrollment and staffing levels as the project. As such, roadway traffic noise related to project development would be less than significant and the same as the project. As it relates to noise, campus operations associated with the Previous Project Alternative would also be similar to those of the proposed project. Noise associated with stationary point sources on-site would be less than significant and equivalent to the project.

j. Transportation and Circulation

Construction of the Previous Project Alternative would generate a range of approximately 58 to 482 daily trips, with an average of 222 daily trips, which is greater than that for the project. The increase in construction-related trips is primarily due to the need for increased truck trips to accommodate the amount of earthwork. Based on information provided by Crain and Associates, construction traffic would result in short-term unmitigable, significant impacts on three street segments:

- Stansbury Avenue between Dickens Street and Greenleaf Street
- Stansbury Avenue north of Valley Vista Boulevard
- Stansbury Avenue south of Valley Vista Boulevard

As the project would impact only one street segment (Stansbury Avenue south of Valley Vista Boulevard), construction traffic impacts for the Previous Project Alternative would be greater compared to the project. The Previous Project Alternative would implement a similar construction parking strategy as the project, and as such, construction parking impacts would be less than significant and equivalent to the project.

The Previous Project Alternative proposes the same increase in student enrollment and staffing levels as the project. As such, roadway traffic related to project operation would be equivalent to the project, and would significantly impact: (1) Ventura Boulevard and Stansbury

Avenue during the A.M. and school P.M. peak hours; (2) Valley Vista Boulevard (South) and Beverly Glen Boulevard during the A.M. and school P.M. peak hours; and (3) Valley Vista Boulevard and Stansbury Avenue during the A.M. peak hour. Also like the project, impacts on residential street segments would be less than significant with the exception of Stansbury Avenue south of Valley Vista Boulevard. Implementation of the project's mitigation measures would reduce these significant traffic impacts to levels that are less than significant.

As discussed above, under this Alternative, all vehicles entering the campus through the Stansbury Avenue entrance would either drive directly to the drop-off/pick-up area or enter directly into the semi-subterranean parking facility. The semi-subterranean parking facility would provide increased capacity for vehicle queuing on campus during student drop-off and pick-up periods, with space for up to 33 vehicles to queue inside the lower level and 27 vehicles to queue inside the upper level of the facility. This would allow the campus area currently used as a surface parking lot to become the student drop-off/pick up area with an appreciably greater area for student loading and unloading, including room for a maximum of approximately 77 vehicles. As a result, there would be on-campus queuing capacity for 137 vehicles. With this increase in on-campus queuing capacity, this Alternative would eliminate the queuing of vehicles currently experienced on Stansbury Avenue. Thus, this Alternative would result in less than significant impacts on queuing that would be similar to the project.

Furthermore, since the Previous Project Alternative would provide 306 parking spaces on-site, which is the same as the project, the parking supply would be sufficient to meet parking demand. Impacts on parking would be less than significant and equivalent to the project.

Impacts relative to emergency access, public transit, pedestrian/bicycle safety, and consistency with the applicable transportation policies of the Community Plan would also be less than significant, like the project. Relative to pedestrian safety, however, the Previous Project Alternative would not have same degree of separation of vehicular queuing and pedestrians, and therefore would have a greater impact than the project.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Previous Project Alternative would meet the underlying purpose of the project to address the needs of existing and future programs offered within the campus since it would provide new teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. The Previous Project Alternative also would provide for vehicular circulation and queuing improvements and increased parking on-site.

With the Previous Project Alternative, the project's educational objectives would be achieved, including the objective to modernize and reconfigure instructional space; create separate dedicated facilities for the athletic, visual arts, and performing arts programs; create science facilities as well as additional classrooms that reflect the needs of the twenty-first century Buckley student; create state-of-the-art library and technology facilities; provide appropriate instructional space for school programs; accommodate a modest increase in total student enrollment to support Buckley's educational philosophy, enhance curriculum flexibility, and promote high academic standards encompassing a broad curriculum; and introduce an Aquatic Center with an outdoor competition swimming pool in order to consolidate the swimming program and associated uses and optimize indoor multipurpose space within the Disney Pavilion.

The Previous Project Alternative would meet some of the site planning objectives of the project, including the objective to eliminate the existing queuing of vehicles on Stansbury Avenue. Thus, this Alternative would respect the residential character of the surrounding neighborhood to some degree. This Alternative would also meet the objectives to: provide facilities that meet modern fire protection, disabled access, and energy efficiency standards; create on-campus parking spaces that sufficiently accommodate the vehicles operated by students, parents, and visitors that travel to the campus on a regular daily basis; contain vehicle queuing and student drop-off/pick-up within the campus; unify the campus and reduce operational and safety challenges by eliminating regular access (except for emergency vehicles) along the internal roadway that currently bisects the campus; revise operating conditions that are confusing or stimulate difficulties between Buckley and its neighbors and incorporate current City standards for schools within the City; create a visually unified campus and further harmonize structures and landscaping with the natural landforms that surround the campus; upgrade mechanical facilities and improve energy efficiency throughout the campus by centralizing mechanical infrastructure within a central plant, and minimize hardscape and roadways in favor of a landscaped campus featuring native plant species appropriate for the canyon setting.

The Previous Project Alternative would require more earthwork and a longer construction duration than the proposed project, and thus the construction-related objectives to minimize impacts and disruption of classes would not be achieved to the same extent as under the project. Additionally, the objectives relative to the location of construction and design of new development would not be achieved since this Alternative would require more intensive construction activities throughout more of the campus, including in the northwestern portion of the campus adjacent to existing residences. Furthermore, the Alternative would not achieve the site design objective to provide an open air waiting area for students at the same grade as the pick-up/drop-off area within the parking facility so as to maximize student safety and the efficiency of the pick-up/drop-off process.

The Alternative would achieve the Community Plan and Specific Plan objectives to provide adequately sized educational facilities to serve the needs of the existing and future population and to emphasize a campus layout, building scale, and architectural design that improves the functionality of the campus, is compatible with the character of the surrounding community, and complements the existing structures on-site. Additionally, as the Previous Project Alternative would eliminate the existing queuing on Stansbury Avenue (which is considered a land use compatibility issue), the objective to promote land use compatibility with surrounding uses would be met.

As with the proposed project, the Previous Project Alternative would achieve the community objectives to ensure adequate public services and facilities, preserve and enhance the scenic resources and features found on-site, and preserve, complement and enhance views.

Overall, while the Previous Project Alternative would achieve all of the educational objectives, this Alternative would not achieve the site design and community objectives nor the Community Plan and Specific Plan objectives to the extent that the project would. Specifically, the objectives pertaining to construction and minimization of impacts would not be met under this Alternative.

V. ALTERNATIVES
F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Guidelines also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this EIR, the range of feasible alternatives includes the No Project/No Build Alternative; Alternative Use (All Residential) Alternative; Single Level Parking Facility Alternative; No Parking Facility Alternative, and Previous Project Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative with the environmental impacts associated with the proposed project is provided in Table V-1 on page 387. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the Alternatives to "avoid or substantially lessen one or more of the significant effects" of the project.

Of the Alternatives analyzed in the EIR, the No Project/No Build Alternative is considered the overall environmentally superior alternative as it would reduce the vast majority of the significant or potentially significant impacts occurring under the proposed project to no impact or levels that are less than significant. However, as indicated above, this Alternative would not meet most of the educational, site design, community, Community Plan or Specific Plan objectives established for the proposed project (although the objectives pertaining to construction and minimization of impacts would be met to a greater degree as compared with the proposed project due to the absence of any construction activities under the No Project/No Build Alternative).

In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Alternative Use (All Residential) Alternative would be the environmentally superior alternative. This Alternative would reduce more of the project impacts than any of the other remaining alternatives. Two of these reduced impacts, operational noise and operational traffic, would be less than significant without mitigation, as opposed to less than significant with mitigation as under the project. However, none of the project's significant and unavoidable impacts would be reduced or eliminated under this Alternative.

Under the Alternative Use Alternative, the Buckley School would cease operations and the site would undergo a major change in use and development. Thus, this Alternative would not meet the underlying purpose of the project, nor would it achieve any of the project's educational objectives. The Alternative Use Alternative also would not meet many of the site planning objectives, nor achieve many of the Community Plan and Specific Plan objectives to the extent that the project would. Regardless, the Alternative Use Alternative would be considered environmentally superior to any of the other alternatives evaluated in this EIR.

While the Single Level Parking Facility would achieve most, but not all, of the project's objectives, when reviewing the comparative analyses above, this Alternative would only somewhat reduce but not eliminate the significant and unavoidable impacts of the project (e.g., short-term construction traffic impacts) that are solely attributable to the construction of the proposed project. Furthermore, the Single Level Parking Structure would result in greater impacts in other key issue areas (e.g., access and queuing) when compared with the project. Thus, when the impacts are viewed as a whole, the Single Level Parking Facility would not be environmentally superior to the proposed project. In addition, the No Parking Facility and Previous Project Alternatives would result in even greater impacts when compared with the proposed project and thus, would also not be environmentally superior to the project.

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. Following is a summary of the impacts associated with The Buckley School Campus Enhancement Plan that were concluded to be significant and unavoidable. These impacts are also described in detail in Section IV, Environmental Impact Analysis, of this EIR. All of the significant and unavoidable impacts of the project are related to short-term construction activities.

Aesthetics: As analyzed in Section IV.A, Aesthetics, during construction activities, temporary bungalows would be located within the area of the existing baseball diamond as well as in a small area immediately north of the Academic Building South. As previously described, one modular unit located by the Academic Building South would be utilized for food service during construction of Phases 1 and 2; bungalows with up to 26 classrooms would also be located on Gilley Field, with additional modular units for offices and restrooms, for up to approximately 18 months during construction of Phase 2 (primarily during the 2010–2011 school year). Construction impacts would be significant and unavoidable due to the perceived visual discord posed by the temporary classroom bungalows. There are no feasible mitigation measures to substantially reduce this impact to a less than significant level. Please refer to Section IV.A, Aesthetics, for further discussion of this topic.

Air Quality: As analyzed in Section IV.B, Air Quality, even with implementation of the mitigation measures, the project would remain in exceedance of the SCAQMD regional significance thresholds for NO_X during the most intense construction period. As such, the regional emissions during project construction would be significant and unavoidable. Based on an analysis for a worst-case modeled construction day, PM_{10} concentrations would be in excess of the localized significance threshold. Actual construction activities on average would typically operate at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled predicted set of conservative assumptions likely overstates the potential localized impacts, but is still concluded to remain significant and unavoidable even with incorporation of all feasible mitigation measures. Please refer to Section IV.B, Air Quality, of this EIR for further discussion of this topic.

Noise: As analyzed in Section IV.I, Noise, even with implementation of mitigation measures, construction-period noise impacts would continue to exceed the 5 dBA significance criterion at multiple receptor locations during all project construction phases. Noise impacts would be the highest at multiple residence locations situated along Camino de la Cumbre and Stansbury Avenue. At some residence locations along these two streets, the hourly L_{eq} could potentially increase by as much as 10 dBA over baseline ambient noise conditions. Other sensitive receptors, including those along Camino de Solana and Beverly Ridge Drive, would also experience noise levels that exceed City significance thresholds, where the daytime hourly L_{eq} noise level after implementation of mitigation measures could potentially increase by as much as 5 dBA even with implementation of feasible mitigation measures. As such, construction-period noise impacts would be significant and unavoidable.

In addition, roadway noise attributable to construction traffic volumes would exceed the 5 dBA significance threshold along the following roadway segments during various portions of the construction period: Valley Vista Boulevard, west of Stansbury Avenue; Valley Vista Boulevard, east of Stansbury Avenue; Stansbury Avenue, between the School's front gate and Valley Vista Boulevard; and Stansbury Avenue, north of Valley Vista Boulevard. As there is no feasible mitigation to reduce these impacts, roadway noise impacts during construction would be significant and unavoidable.

Traffic: Construction-related traffic impacts on the segment of Stansbury Avenue, south of Valley Vista Boulevard would remain significant even after the implementation of mitigation measures. There are no feasible mitigation measures that could reduce construction-traffic impacts to levels that are less than significant. The only reasonable alternative mitigation would be to extend the construction time frame so that there would be less construction personnel and vehicles on-site at any give time. However, such a measure would be inefficient as well as costly and would prolong disruption to School operations and the surrounding neighborhood. Please refer to Section IV.J, Transportation and Circulation, of this EIR for further discussion of this topic.

B. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

In addition to identification of the project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines also requires that the reasons why the project is being proposed, notwithstanding these impacts, be described. The reasons why this particular project has been proposed are grounded in a comprehensive listing of project objectives included in Section II, Project Description, of this EIR. In general, the underlying purpose of the proposed project is to enhance the campus facilities to meet the needs of existing and future programs offered within the campus. The project includes the provision of adequate teaching space for all educational levels, specialty teaching spaces, and multipurpose spaces for educational gatherings that cannot occur in a standard classroom. In addition, several alternatives to the proposed project were considered in Section V, Alternatives, of this EIR. Among those alternatives, no feasible alternative was identified that would reduce all of the significant unavoidable effects of the proposed project (see Section VI.A, above). In addition, none of the alternatives would achieve the objectives to the extent of the project. Moreover, all of the significant unavoidable impacts that are anticipated to result from the proposed project are short-term construction effects. Finally, since the No Project Alternative would not meet the underlying purpose of the project, it is not considered a feasible development alternative.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) indicates that:

> “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. The new development would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project site. Construction of the project would require the consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment.

The resources that would be committed during operation of the project would be similar to those currently consumed within the City of Los Angeles and on the project site. These would include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. It is noted here that increased consumption generated by the project's increased enrollment of 80 students is not significant when compared with existing energy consumption levels Citywide. Operation of the project would occur in accordance with Title 24, Part 6 of the California Code of Regulations, which sets forth conservation practices that would limit the amount of energy consumed by the project. In addition, the project would be subject to energy efficient planning and construction guidelines as set forth by the City of Los Angeles. Furthermore, implementation of the project, which includes the development of a central plant and the potential installation of photovoltaic solar panels, would result in greater energy efficiency for School operations. However, the energy requirements associated with the project would, nonetheless, represent a long-term commitment of essentially non-renewable resources.

The limited use of potentially hazardous materials typical of educational facilities, including cleaning solvents, pesticides for landscaping, and chemicals used for photography, science, and pottery classes, would continue to be used and stored on the project site. These materials would be contained, stored, and used in accordance with manufacturers' instructions and applicable standards and regulations. In addition, demolition activities would comply with regulatory requirements to ensure that asbestos and lead-based paints are not released into the environment. Compliance with such regulations would serve to protect against a significant and irreversible environmental change resulting from the accidental release of hazardous materials. Similarly, in the event that underground storage tanks (USTs) are discovered on-site, such USTs would be properly removed and any associated contamination would be appropriately remediated, in accordance with regulations, thereby avoiding any significant environmental change that could occur as a result of environmental accidents associated with USTs.

The project site has been used for educational facilities since the late 1960s and was a country club prior to its existing use. Although the site is zoned and designated for residential uses, the existing school uses are permitted on the site pursuant to an existing approved Conditional Use Permit (CUP). Development of the project represents the continuation of educational uses on land that is already committed to such uses. Such a commitment would be justified, as educational uses are permitted on the site by CUP pursuant to the City's Zoning Code.

In sum, construction and operation of the project would result in the irretrievable commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses during the life of the project. However, continued use of such resources would be of a relatively small scale and would be consistent with regional and local growth forecasts in the area. Furthermore, the loss of such resources would not be highly accelerated as compared to existing conditions. In addition, project implementation would result in energy efficiency upgrades with the introduction of a central plant, as well as with the potential introduction of solar roofing materials on the roofs of some campus buildings, which would allow the School to generate a portion of its own electricity demand. As such, although irreversible environmental changes would result from the project, such changes would not be considered significant.

D. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a proposed project be considered. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth or the construction of additional housing in the area or region. According to the CEQA Guidelines, growth-inducing impacts can include impacts associated with the removal of obstacles to growth as well as the development of facilities that encourage and facilitate growth.

The project would improve the facilities at the existing Buckley School Campus to better serve existing and future school programs. Student enrollment on-site would be increased from a maximum of 750 students to 830 students. While this represents a small increment of direct growth, neither this increment nor other aspects of the project would be expected to induce subsequent additional growth. As the project site is currently developed with school uses, the project would not require the extension of infrastructure such as roads or utilities that would be expected to accommodate substantive growth beyond the project itself. It would not open up undeveloped areas to new development or induce growth previously held in check by inadequate access or infrastructure capacity. Overall, no growth-inducing impacts beyond the direct effects of minor staff expansion would occur as a result of this project. It is noted that The Buckley School is the largest employer in Sherman Oaks and that the project would yield a minor increase in staffing levels, which would be considered a beneficial economic effect.

E. POTENTIAL SECONDARY EFFECTS

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires that "if a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed." With regard to this section of the CEQA Guidelines, the potential impacts that could result with the implementation of each mitigation measure proposed for the project was reviewed. The following provides a discussion of the potential secondary impacts that could occur as a result of the implementation of the project mitigation measures, listed by environmental issue area.

1. Aesthetics (See Section IV.A. of this EIR)

Mitigation Measure A-1 requires that open space areas be landscaped to minimize view impacts. This mitigation measure would be implemented wholly on-site and would result in beneficial off-site impacts with respect to views. Thus, no secondary impacts would result. Mitigation Measure A-2 prohibits nighttime lighting for the athletic field, Aquatic Center, and outdoor courts, except as required for low level security and exiting purposes. As this measure is intended to limit physical impacts, no secondary impacts would occur.

2. Air Quality (See Section IV.B. of this EIR)

Mitigation Measures B-1 and B-5 require watering of the project site when needed during construction. This would be done periodically, primarily during site preparation, clearance, and grading. In addition, the amount of water required would be limited, as it would only be used as necessary and in an efficient manner. Therefore, no significant impacts would result from implementation of this measure. Mitigation Measures B-2 requires that internal construction roads with more than 50 daily trips be surfaced with base material or decomposed granite. Adequate material would be provided on-site for the implementation of this measure, and such activities would not require additional truck trips that could generate secondary impacts. Mitigation Measure B-3 requires hourly street sweeping as needed if visible soil material has been carried onto adjacent public paved roads. Street sweeping would occur during off-peak hours and would not add substantial vehicle trips to adjacent streets. As a result, no secondary impacts would result. Mitigation Measures B-4, B-6 through B-8, B-11 through B-12, and B-15 address construction equipment inspection and maintenance, construction equipment staging area, traffic speeds, construction worker parking lots, construction equipment control, and coordination of outdoor school activities. Because these measures represent procedural actions and would not result in physical changes to the environment, no secondary impacts would occur. Mitigation Measure B-9 requires the use of electricity from power pole lines rather than temporary generators if or where feasible, and Mitigation Measure B-10 requires the use of on-site mobile equipment powered by alternative fuel if or when feasible. Neither of these measures would result in physical changes to the environment and, as such, would not result in secondary impacts. Mitigation Measure B-13 requires the development of a construction traffic management plan. Construction truck trips and workers' trips have been considered in Section IV.L, Traffic, of this EIR. This measure would reduce construction workers' trips, which would be considered a beneficial impact. As such, the environmental effect associated with the implementation of this measure has been considered in the impacts discussion in Section IV.B, Air Quality, of this EIR; no additional impacts, including potential secondary effects, are anticipated. Lastly, Mitigation Measure B-14 requires the use of energy-saving double-glazed windows in new structures where feasible. This mitigation measure would serve to conserve energy, which would be a beneficial impact and would not have secondary physical effects.

3. Biological Resources (See Section IV.C. of this EIR)

Mitigation Measure C-1 provides specific requirements regarding the planting of replacement trees, which would have beneficial environmental impacts. Although water and minor amounts of fertilizer may be needed in the long-term care and maintenance of replacement trees, no significant secondary effects would result from implementation of this mitigation measure. Mitigation Measure C-2, which requires that construction work potentially impacting protected trees be approved by a tree expert, and Mitigation Measure C-3, which requires informing construction employees of tree protection practices, are procedural requirements which would not have physical impacts. Therefore, no secondary impacts would occur. Mitigation Measure C-4 requires that fencing be placed around partially impacted trees. Placement of fencing would be temporary and as such, would not result in any significant secondary impacts. Mitigation Measure C-5, which states that removal of large trees and vegetation should take place outside of the nesting season, is a procedural requirement. No physical impacts would occur from implementation of this mitigation measure, and as such, no secondary impacts would occur.

4. Cultural Resources (See Section IV.D. of this EIR)

Mitigation Measure D-1 and D-2 are procedural requirements that require that a qualified paleontologist be retained and that construction personnel be informed and instructed of potential paleontological resources. No physical impacts would occur from implementation of these mitigation measures, and no secondary impacts would occur. Mitigation Measure D-3 requires that a field survey be conducted by the paleontologist, and Mitigation Measures D-4 through D-8 provide requirements in the event of accidental discovery of fossils. These mitigation measures would be implemented to ensure that no significant impacts to fossils would occur and would not result in secondary impacts.

5. Geology (See Section IV.E. of this EIR)

Mitigation Measure E-1 requires the incorporation and implementation of the recommendations provided in the Geotechnical Report, included as Appendix F to this EIR. This measure and the referenced geotechnical recommendations are designed to ensure that no significant project impacts related to geology would occur. As the geotechnical recommendations pertain to site design and building construction, physical impacts could result from implementation of this measure; however, such impacts have generally been included in the analyses of project construction impacts in each of the environmental issue areas addressed in Chapter IV of this EIR. No other physical changes to the environment would occur beyond those that would result during project construction, as addressed in Section IV.E, Geology, and no secondary impacts would occur.

6. Hazards and Hazardous Materials (See Section IV.F. of this EIR)

Mitigation Measure F-1 requires project compliance with SCAQMD Rule 1403 regarding the handling of asbestos-containing materials (ACMs). This measure represents a procedural action intended to preclude negative effects and would not result in secondary impacts. Mitigation Measures F-2 and F-3 are procedural requirements for the use of certified professionals during the removal of ACMs and lead based paints. The implementation of these mitigation measures would not result in any physical impacts, and no secondary impacts would result. Mitigation Measures F-4 relates to UST removal in compliance with applicable regulatory requirements, and as such is designed to reduce potential environmental impacts. Mitigation Measures F-5 and F-6 address contaminated soils, subsurface features, and groundwater and ensure that no significant impacts would occur during grading and construction activities. Implementation of these measures would not result in secondary impacts.

7. Hydrology (See Section IV.G. of this EIR)

No mitigation measures related to hydrology and surface water impacts would be required for the construction and operation of the project. The proposed project would be subject to regulatory requirements, including preparation of a SWPPP and compliance with SUSMP requirements. The implementation of these regulations would reduce existing erosion and surface water pollutants and would not cause any secondary impacts to on- or off-site locations.

8. Land Use (See Section IV.H. of this EIR)

No mitigation measures would be required for the project with respect to land use. As such, no potential secondary effects would result.

9. Noise (See Section IV.I. of this EIR)

Mitigation Measure I-1 would limit engine idling from construction equipment. This mitigation measure would have a beneficial impact on noise levels and would not result in secondary impacts. Mitigation Measure I-2 requires that construction equipment be fitted with residential grade mufflers. Implementation of this measure would not result in physical changes to the environment and, as such, would not result in secondary impacts. Mitigation Measure I-16 requires that a temporary eight-foot sound barrier be erected along portions of the north and west property lines. As this wall would be erected for a short period of time, as necessary to break the line-of-sight between the noise sources and residences to the north and west, no significant secondary impacts would result.

10. Transportation and Circulation (See Section IV.J. of this EIR)

Mitigation Measures J-1 and J-2 would require temporary truck crossing signs and flag persons to minimize construction truck traffic impacts on neighborhood streets. Implementation of these measures would not result in physical changes to the environment, and, as such, would not result in secondary impacts. Mitigation Measure J-3 would minimize construction traffic during peak school periods. This measure is a procedural requirement and would not result in secondary impacts. Mitigation Measure J-4 involves implementation of a Transportation Demand Management (TDM) Plan to reduce project trips such that there would be no increase in daily trips above that currently generated by the site. Physical impacts related to carpooling, the use of busses, etc. have been considered within the traffic analysis, and with no increase in project vehicle trips, secondary impacts would be avoided. Mitigation Measures J-8 and J-10 regard submittal of a compliance report and driveway plans to DOT and would not result in secondary impacts. Mitigation Measures J-5 and J-6 are physical roadway improvements to be implemented as part of the proposed project to reduce traffic impacts. While Mitigation Measure J-6 would result in the removal of four to five on-street parking spaces, their removal would not result in a significant impact. In addition, Mitigation Measures J-7 and J-8 regarding student drop-off would also be implemented as part of the project. Environmental effects associated with the implementation of these improvements have been considered in the impacts discussion in this EIR; no additional impacts, including potential secondary effects, are anticipated.

F. EFFECTS NOT FOUND TO BE SIGNIFICANT

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a statement briefly indicating the reasons that certain effects of the project were determined not to be significant and were therefore not discussed in detail in the EIR. An Initial Study was prepared for the project and is included in Appendix B of this EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the EIR. Impacts associated with the proposed project were determined not to be significant for agricultural resources, mineral resources, population/housing, and public services. The following discussion explains how a less than significant determination was derived for each of these issue areas.

1. Agricultural Resources

As identified in the Initial Study, no agricultural uses or related operations are present within the site or surrounding area. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor lands under Williamson Act contract within the area. The School campus is zoned RE-40-1-H (Residential Estate, Height District 1, Hillside), and pursuant to the

City of Los Angeles Planning and Zoning Code, agricultural uses are not permitted under this zoning designation. As such, the proposed project would not involve the conversion of farmland to other uses, either directly or indirectly. Therefore, no impacts to agricultural land or uses would occur.

2. Mineral Resources

The project site is not listed as a potential or existing mineral resource extraction area for the State of California. Additionally, the project site's land use, as defined by the City of Los Angeles General Plan and the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, is not designated as a mineral extraction land use. Therefore, the chances of uncovering mineral resources during construction and grading would be minimal. As such, project implementation would not result in the loss or availability of a known mineral resource that is locally important or that would be of value to the region or residents of the State, and no impacts would occur.

3. Population/Housing

There are no existing residential units within the project site, and the project would not involve the construction of new residences. As such, project implementation would not result in the displacement of any housing, necessitate the construction of replacement housing, generate a direct increase in the permanent population of the area, nor cumulatively exceed official regional or local population projections. Under the project, permitted enrollment for the School would increase incrementally over an approximate seven-year timeframe from 750 students to 830 students. With this modest enrollment increase of approximately 10.7 percent, the project would not induce population growth either directly or indirectly in the area surrounding the School. To accommodate these students, up to eight additional faculty members and up to eight other additional staff could be hired during this same timeframe. This increase in employment would be well within the employment forecast set forth by SCAG. Furthermore, while not expected, any potential induced residential growth in the area resulting from the new employment opportunities on-site would not be substantial. In addition, no new roadways or other major infrastructure that would serve an area beyond the project site would be constructed as part of the project. Thus, no impacts associated with induced population growth would occur.

4. Public Services

Fire protection and emergency medical services are provided by the Los Angeles Fire Department (LAFD). Two nearby LAFD fire stations would continue to provide fire protection to the School in an emergency situation. The project site is located in the Very High Fire Hazard Severity Zone, as defined in the City of Los Angeles Municipal Code, and as such, the site is subject to more stringent fire prevention requirements than other areas outside of the district. All of the new buildings would include fire sprinklers, fire alarm devices, and all other approved fire safety technologies in compliance with applicable local and State code requirements. Since the project would not result in a substantial increase in faculty or students within the immediate project area, existing fire service levels in the area would not be significantly affected. The project would not necessitate the addition of a new fire station or an alteration in equipment or personnel, and thus, impacts on fire protection services would be less than significant.

The project site is served by the Los Angeles Police Department (LAPD), Valley Bureau, Van Nuys Community Police Station. The campus includes a guard house at the Stansbury Avenue entrance where campus security monitors the ingress and egress of vehicles into the campus, providing for controlled access, and the campus is currently monitored by a team of security personnel. Given the continued security provisions on-site under the project, the projected student and staff increases would not have a substantial impact on police protection services, including the need for additional or altered LAPD facilities, equipment, or officers. Therefore, impacts to police protection services would be less than significant.

Los Angeles Unified School District (LAUSD) provides public school services in the project area. Since the project does not involve the construction of new dwelling units, a direct impact on the demand for additional classroom space within LAUSD or any other school district would not occur. Any potential indirect impact on public school facilities resulting from the potential for eight new faculty and eight new staff to relocate to the area and generate a need for additional public school facilities would be inconsequential. Specifically, based on the student generation rates for new non-residential development set forth in the School Fee Justification Studies prepared in 2002 for LAUSD, the project would generate approximately one student within LAUSD boundaries. Furthermore, the project would provide permanent, upgraded, and expanded school facilities, which would allow the School to continue and enhance its educational programs, resulting in a beneficial impact associated with school facilities. As such, the project would not result in a need for new or altered public school facilities and no significant impacts would occur.

Implementation of the project would not physically impact parks or recreational facilities in the project vicinity. The School currently provides its students with recreational/athletic facilities on campus and would continue to do so subsequent to implementation of the project. For athletic events that the school cannot accommodate, the School currently uses off-site parks for athletic matches and team practices (e.g., tennis and cross-country teams). Use of off-site parks by the tennis and cross-country teams would continue after implementation of the project. Additionally, implementation of the Enhancement Plan would enhance the existing recreational/athletic facilities on-site. Furthermore, the project does not include the construction of new residences, which typically generate a direct demand for parks. Since implementation of the Enhancement Plan would not generate new demand for existing parks or require the development of new parks in the adjacent vicinity, no impact on parks within the project vicinity would occur.

The project would result in the continued need for other governmental services, including roads. However, the additional use of roadways would not be excessive and would not necessitate the upkeep of such facilities beyond normal requirements. Therefore, the project would not have an effect upon or result in a need for new or altered government services and no impacts would occur.

5. Utilities

As analyzed in the Initial Study, the project's modest increase of 80 students by the 2014–2015 school year resulting in a student population of 830, which would generate approximately 9,960 gpd of wastewater. The existing sewer lines that serve this site are adequate to accommodate the increase. Furthermore, implementation of water conservation measures, such as those required by Titles 20 and 24 of the California Administrative Code, would ultimately reduce wastewater flows. Additionally, it is expected that the recently expanded Hyperion Treatment Plant would be able to accommodate the wastewater treatment demands of the project. Thus, impacts on wastewater facilities would be less than significant. With regard to water, implementation of the proposed project would generate a water demand of approximately 12,450 gpd. However, compliance with water conservation measures such as those required by Titles 20 and 24 of the California Administrative Code would help to reduce this projected water demand. The estimated demand for water that would be generated by the project would be accommodated by the existing water infrastructure. Although not anticipated, any necessary relocation of water and wastewater utility lines on-site would occur under the direction of the City of Los Angeles Department of Public Works and would likewise be adequate to accommodate project demands. Therefore, impacts on water infrastructure would be less than significant.

In addition, according to the School, the increase in student and faculty numbers anticipated by the 2014–2015 school year would not require additional solid waste service nor would it require any substantial changes to the existing waste disposal system within the campus.[177] Furthermore, as a result of recent actions to increase landfill capacity within the County, it is anticipated that the landfills would have sufficient capacity to accommodate solid waste demand of the project. Therefore, impacts on solid waste facilities, with particular regard to landfill capacity, would be less than significant.

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[177] *Personal communication with Curtis Covington, Plant Facilities Supervisor for The Buckley School, January 8, 2006.*

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VIII. REFERENCES

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